



December 16, 2015

Environmental Management Support, Inc.
Attn: Mrs. Edie Findeis Cromwell
8601 Georgia Avenue, Suite 500
Silver Springs, Maryland 20910

Phone: 301-589-5318

Dear Mrs. Findeis:

Please accept this proposal for Cleanup Grant assistance related to the City of Twinsburg's "Old School" property located within our "Central Area Redevelopment" project. This application is submitted on behalf of the City of Twinsburg, Summit County, Ohio. Required content specific to guidelines for this assistance is provided in the following.

- a. Applicant identification information:
City of Twinsburg
10075 Ravenna Road
Twinsburg, Ohio 44087
- b. The City of Twinsburg DUNS number is 023816031.
- c. This application requests the following assistance:
 - i) Grant type: Cleanup
 - ii) Federal funds requested: \$ 200,000
 - iii) Contamination: Hazardous substance (asbestos)
- d. Location of the project:
City of Twinsburg, Summit County, Ohio
- e. Property information:
Twinsburg Old School
8997 Darrow Road
Twinsburg, Ohio 44087

f. Contacts:

i. Project Director: Larry E. Finch, AICP
10075 Ravenna Road
Twinsburg, Ohio 44087
Ph: 330-963-6154
Fx: 330-963-6285
Email: lfinch@twinsburg.oh.us

ii. Chief Executive: Ted Yates, Mayor
10075 Ravenna Road
Twinsburg, Ohio 44087
Ph: 330-963-6207
Fx: 330-963-6251
Email: tyates@twinsburg.oh.us

g. Date submitted: December 16, 2015

h. Project period: Three years

i. Population:

i. Total population as reported in the 2010 Census – 18,873

j. Other Factors Checklist: see attached

We urge your favorable consideration of this request. Should you require additional information or clarification of any item do not hesitate to contact Larry Finch, the Project Director.

Sincerely,



Ted Yates, Mayor

Appendix 3 Cleanup Other Factors Checklist

Name of Applicant: City of Twinsburg, Summit County, Ohio

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Targeted brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	See 3a attached
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	See 3b Attached
Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient's IMCP proposal which lists/describes the core partners and implementation strategy parties.	
Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.	See 3c Attached
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	See 3d Attached

Item 3a - Leveraging Commitments

Included as Attachment 3a is resolution 151-2015. This resolution provides the Mayor authorization to apply for the US EPA Brownfield Cleanup Grant and provides for the local share up to \$50,000.

Also included in the Attachments section as Attachment 3d is a letter of support and commitment of financial assistance from the Twinsburg Community Improvement Corporation (TCIC). A \$20,000 grant has been committed from the TCIC to supplement the City's local share and will be applied to non-grant activities.

Item 3b – Significant (2008 or later) Economic Disruption

Twinsburg was one of the automotive communities impacted by the national readjustment in automotive manufacturing capacity accommodated by the bankruptcy of General Motors and the Chrysler Corporation. Specifically, Twinsburg was the home of the Chrysler Twinsburg Stamping Plant which was closed as part of the bankruptcy proceedings. The closure announcement was made in May of 2009 and the plant was shuttered in July, 2010. This closure resulted in an immediate loss of 1,280 local jobs and more than 12 percent of the City's total revenue. These revenue losses necessitated the City's reduction of public services, staff reductions, staff travel restrictions, hiring and wage freezes and other austerity measures. The City reluctantly requested and was granted an income tax increase of .25 percent by the residents to help stabilize City revenues while recovery efforts were implemented. Separated Chrysler employees and the City benefitted from planning assistance provided through the Economic Development Administration's (EDA) Community Economic Adjustment Assistance Program (CEAP) and from funding by EDA for a Recovery Action Plan that the City took the lead on preparing for the region. However, the City received no direct financial assistance and relied on its own resources to facilitate a recovery.

The voter approved .25 percent income tax increase was removed by the electorate in 2014. Total income tax revenues are just now reaching the same levels as those prior to the Chrysler closure in 2010. While many of the austerity measures implement upon the plant closing have since been terminated, the City continues to carefully monitor expenditures and work diligently toward increasing economic activity and employment opportunities. The project to be funded by this request is a continuation of economic development efforts directed at stimulating investment in Twinsburg's central area.

Item 3c – Recipient of Partnership for Sustainable Communities (PSC) grant funding or technical assistance.

Twinsburg's recent comprehensive plan update included a concentrated planning effort focused on the City's central area, within which the proposed project is located. During this planning effort the City applied for, and received, a grant of technical assistance. This grant of technical assistance was provided by the Project for Public Spaces/Livability Solutions team under the Building Blocks for Sustainable Communities Program. Technical assistance utilized training related to the ITE "Designing Walkable Urban Thoroughfares" manual and was led by representatives from the Congress for New Urbanism. Design considerations were applied to the City's conceptual plan for the central area, which was reviewed by more than 30 workshop attendees over the April 25th and 26th period (attached to this Other Factors section). New urbanism principals were reviewed and applied to the plan. Attendees contributed constructive criticism of the City's concept plan including comments related to the project site. The end result was an increased awareness by all of walkable and complete streets standards and a refined concept plan applicable to the project site.

Item 3d – Recipient of EPA Area-wide Planning grant.

While the City was not a recipient of an area-wide planning grant it was able to take advantage of an area-wide brownfield assessment grant provided through the Northeast Four County Area-wide Organization (NEFCO). This assistance enabled Phase 1 and Phase 2 Environmental Assessments and an Asbestos Survey to be completed for the project site. The City contributed a share of costs to enable the removal of an underground fuel storage tank, installation of test wells and monitoring. No further actions were required related to fuel tanks, contaminated soils or other site issues. A support letter from NEFCO is included (in Attachment 3c) of this submittal which documents support and this prior partnership.



419 Lafayette Street
Seventh Floor
New York, NY 10003
212 620 5660
www.pps.org

Larry Finch
City of Twinsburg
Twinsburg City Hall
10075 Ravenna Road
Twinsburg, OH 44087

January 11, 2013

Dear Larry,

Congratulations - your organization has been selected to receive technical assistance in 2013 from the PPS/Livability Solutions team, funded by U.S. EPA's Office of Sustainable Communities under their Building Blocks for Sustainable Communities Program! Thank you for your application and interest in our program; we are very pleased to offer you this opportunity and look forward to working with you. Based on your application, the assistance will utilize and provide training in the Designing Walkable Urban Thoroughfares training, through a 1-2 day workshop, which will be led by Congress for the New Urbanism. As discussed in the grant application, the main goals of this program are to provide communities with strategies to enhance livability, to create lasting economic and environmental improvements, and to effect positive change for their residents, by helping you reach a tipping point or overcoming a significant hurdle in these areas.

In order to tailor this assistance to your needs and to initiate the planning process for your workshop, we would like to schedule a call with you by the end of January. Please respond to this letter via email by January 15th to confirm your commitment to receive technical assistance from PPS or one of its partners in 2013 and to suggest three times when you are available in January for an initial call. If you have any questions, feel free to email or call Kate Rube: krube@pps.org, 212-620-5660x326.

Timeline for 2013 Livability Solutions' Technical Assistance

- **January 2013:** Initial assessment and planning call with Project for Public Spaces and your lead technical assistance provider to discuss your needs, goals, and timeline for technical assistance.
- **February 2013:** Finalize technical assistance plan and draft workshop date; Provide feedback on Memorandum of Understanding that stipulates technical assistance plan and roles for each involved organization.
- **March 2013:** Finalize Memorandum of Understanding with Project for Public Spaces and your lead technical assistance provider.
- **April 2013-September 2013:** Prep for technical assistance workshop; Host workshop.
- **September 2013-December 2013:** Receive technical memo as follow up from technical assistance workshop, which includes recommendations for future work; Finalize memo and performance measures to track progress with your lead technical assistance provider.
- **February/March 2014:** Participate in follow up call with Project for Public Spaces and lead technical assistance provider to discuss progress on recommendations and agreed-upon performance measures.



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Expectations of Awardees

- Designation of one main point of contact who will work with your lead technical assistance provider to provide direction and support.
- Providing feedback on and signing a Memorandum of Understanding with Project for Public Spaces and your lead technical assistance provider (details above).
- Setting a date and location for the technical assistance workshop.
- Working with your lead technical assistance provider to provide feedback on the agenda for the workshop.
- Working to engage local partners and citizens in the technical assistance workshop, including conducting outreach for attendance.
- Hosting technical assistance workshop, which may include providing light refreshments if you so desire.
- Reviewing and providing feedback on the technical memo provided by your technical assistance provider, and developing performance measures to help you in tracking progress.
- Developing a plan to implement technical assistance recommendations.
- Tracking progress towards agreed-upon performance measures and participating in a follow up call to discuss progress and any issues in early 2014.

Thank you again for your application; we are excited to be able to offer you this technical assistance. We look forward to working with you this year!

Cheers,

Kate Rube
Project Manager
Project for Public Spaces
krube@pps.org
212.620.5660x326

Cc: TA lead

Part 2. Narrative Proposal
Twinsburg, Ohio Cleanup Grant Proposal
“Old School” Asbestos Mitigation

INTRODUCTION

The City of Twinsburg, Ohio is making application for financial assistance in the manner stipulated in the FY 16 Guidelines for Brownfields Cleanup Grants (EPA-OSWER-OBLR-15-06). This portion represents the responses associated with Part 2- Narrative Proposal. As such, it follows Section V.B. as referenced in the Guidelines and is organized with the same content and format conventions as reflected in Section V.B. - Ranking Criteria for Cleanup Grants.

1. Community Need

a. Targeted Community and Brownfields

i. Targeted Community Description - The City of Twinsburg traces its beginnings to the Western Reserve Territory of 1817. The community’s early development was supported by lumber milling, liquor distilling and stone quarrying. A typical of Western Reserve town square was framed by three roads which eventually became State routes (14, 82 and 91). The typical land use patterns of public buildings and intense development at the edge of square never developed.

As autos became the primary mode of travel, a number of gas stations located on corners adjacent to the Square, taking advantage of the proximity to State highways. Other buildings adjacent to the Square included a church, bank and a few commercial buildings which developed independently of each other over a long period of time. Consequently, they represented no consistent style, lacked intensity and scale, and exhibited no cohesiveness or sense of place.

Twinsburg experienced slow growth until the Chrysler Company constructed a 2.2 million square foot stamping plant here in 1957. Interstate 480’s construction made the location easily accessible. Twinsburg was provided two highway interchanges: State Route 91 (Darrow Road); and State Route 82 (E. Aurora Road). New land uses clustered around these intersections and largely ignored the Square and its immediate environs. The few commercial buildings situated around the Square never gained traction, and when a large strip commercial center was development in the 1980’s near the Darrow Road interchange, most retail and service related space needs were filled there.

Twinsburg’s central area never developed the critical mass required to sustain economic development. Rapid growth occurring in the 1980’s and 1990’s focused on suburban subdivision and expansive industrial development, both of which required larger land parcels than those available in the central area.

Investment that did occur mimicked the auto-dependent, suburban site development that catered to the car; not the person.

Even today, a substantial portion of the central area of Twinsburg is under-developed. No new buildings have been constructed here for more than a decade in spite of the continued population growth elsewhere in the City. Substantial vacant land exists. Properties around the Square are burdened by obsolete and deteriorating structures. Older, tired looking and physically obsolete buildings occupy key positions. As a consequence of this lack of investment and new construction, lease rates in the area remain depressed. Low lease rate appeal to marginal tenants, which in turn, relay a declining image to the area.

The City has identified key properties where clearance and redevelopment could have dramatic impacts. One of these is the “Twinsburg Old School.” This 54,000 s.f. building consists of two sections: one built in 1921 and the other constructed in 1952. It served as a school until the early 1990’s when the school system vacated the building because the costs to update it exceeded the benefit to the district. The City of Twinsburg acquired the property in a land swap that provided the school district with a larger, more suitable site for its expansion needs. This trade was executed by the City in good faith to benefit the school system whose resources were limited.

Over the years the City put the property to use for various public service agencies. The UAW union leased space for training Chrysler employees beginning in 1996. Kent State University provided training in various management and workforce development skill areas, some of which had appeal beyond Chrysler employees. Recognizing the opportunity to bring higher education to Twinsburg, the City supported the expansion of Kent State University by leasing space to them for a local learning center. Kent State operated a learning center here until 2012 when they moved to a new 44,000 s.f. building on Creekside Drive in Twinsburg.

The Old School had become a maintenance nightmare for the City and Kent State, as the aging building’s infrastructure became more and more inadequate and proved prohibitively costly to repair or replace. The City conducted studies on two occasions to try to clarify improvement needs and to identify an adaptive reuse opportunity. The building’s inherent characteristics like wide hallways, support spaces like a theater and gymnasium, large masonry defined rooms, open stairwells, lack of ADA accessibility and other characteristics proved expensive and difficult to correct. Costs for rehabilitation were estimated to be too high (\$4-8 million) to recoup the investment with leases of space, partly because only 46% of the building would be leasable.

The building is situated in the middle of a 5.1-acre site in the southeast quadrant of central Twinsburg. At least half of the site is suitable for development but is

burdened by the building. The building is further burdened by the existence of hazardous asbestos materials. Mitigation of the asbestos containing materials is estimated to cost approximately \$250,000. A similar amount is estimated for the removal of the building after asbestos mitigation.

The City is just now recovering from significant economic dislocation associated with the 2010 closure of the Chrysler Twinsburg Stamping Plant. This closure eliminated more than 1,200 jobs, taking with them 12% of the City's total tax revenue (see 3(1)(c) – Financial Need). This loss necessitated an increase in the local income tax rate from 2% to 2.25%, making the City's rate one of the higher rates in Summit County.

In 2012 the City partnered with the property owner in applications to the State of Ohio's Clean Ohio Revitalization Fund (CORF) Program and the Jobs Ready Sites (JRS) Program. This partnership was successful in that \$5.2 million was provided from these programs to enable the 2.2 million square foot industrial building and 165-acre site to be cleaned up and repositioned for the future.

The City can now turn to addressing issues in its central area. The Old School site is the catalyst for redevelopment at the southeast quadrant of central Twinsburg. It has frontage on both Darrow Road and on E. Aurora Road. It stretches from Darrow Road on the west to Tinkers Creek on the east. It provides the opportunity to incorporate the City's multi-purpose trail network into the central area by extension of the trail through this corridor.

The site, when combined with adjacent properties will provide the location for a mixed-use, but residentially focused walkable, more sustainable community in immediate proximity to the Square. It will be a location both physically and visibly related to the Square. This type of redevelopment is attractive to empty nesters, young professionals, and those seeking affordable housing in close proximity to life style amenities, transit resources and employment. It is hoped that redevelopment will provide an example for additional reinvestment in other quadrants of the central area.

- ii. Demographic Information – A summary of various characteristics of the population of the City of Twinsburg is provided below:

<u>Characteristic</u>	<u>Twinsburg</u>	<u>Summit Co.</u>	<u>Ohio</u>	<u>Nation</u>
Population	18,795	541,781	11,536,504	308,745,538
% change 2000-2010	10.5	-0.2	1.6	9.7
% Unemployment	N.A.	4.7	5.2	5.5
% Minority	21.5	19.0	16.8	36.3
% change 2000-2010	9.0	3.0	2.0	5.4
Median HH income	\$61,638	\$49,669	\$48,308	\$ 53,046

Source: U. S. Bureau of Census; Factfinder.census.gov, 2010 Demographic Profile and Selected Economic Characteristics.

The State of Ohio and Summit County's growth rates have slowed or stalled between the 2000 and 2010 census periods. During this same period Twinsburg's growth rate continued at a rate similar to that of the nation. Not available at the municipal level, Twinsburg's rate of unemployment is expected to mirror the Summit County rate. Also of note is the fact that the City is becoming more diverse. Minority populations (non-white) increased by 9 percent between the two census periods. With the City's higher than average household incomes, the significant growth in minority population provides evidence that the community is viewed as a favorable location for a diverse and growing middle-class. This project hopes to capitalize on this momentum to establish a more sustainable mixed use central area that would serve all with a more accessible, walkable and safe environment.

- iii. Brownfield Description – The Old School property is illustrated on Figure 1. This 5.1-acre property extends from Tinkers Creek on the east to Darrow Road (west) and from E. Aurora Road 400' to the south. Approximately 2.5 acres lies in the Tinkers Creek flood plain and is not useable for development purposes. The remaining 2.6 acres is shaped like a reverse "L" (toe of the L pointed to the left). The Old School structure, which is situated at the middle of this property, represents a limitation to use of the site for any purpose.

Both Phase 1 and Phase 2 assessments have been performed. Assessments confirmed the existence of asbestos in various building components. An underground fuel oil storage tank was removed in 2013. No other pollutants or hazardous material was identified.

The City has devoted substantial effort in attempts to identify adaptive reuse requirements and opportunities. A code compliance study was completed prior to purchase in 1992 and a specific re-use study completed in 2012. Additional efforts have been devoted to assessing viability of use as a public services facility, commercial offices or condominium conversion.

The code compliance review and subsequent studies examined building improvements required to resolve building deficiencies and to bring the building to current health, safety and building code compliance. Basic building systems were determined to be inadequate and in need of repair or replacement. Building plumbing, electrical service, electrical distribution, heating, cooling and ventilation systems, need repairs, replacement or (in the case of air conditioning) installation. The aging roof has been replaced in part but remains subject to leaks and is in need of repair or replacement. Iron lintels over windows had rusted to the extent that they were causing cracking and displacement of adjacent masonry. Substantial improvements are required to comply with current ADA requirements. Emergency lighting and exit lighting need improvements.

Figure 1 – Old School Property



Imagery ©2015 DigitalGlobe, State of Ohio / OSIP, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2015 Google 200 ft

The 2012 adaptive re-use study was performed to evaluate the improvements required to convert the building into a museum. In addition to the basic building improvements and ADA compliance issues previously identified, the study determined that the amount of useable and leasable space in the building also represented a problem for re-use as only about 46 percent of the building is considered leasable space.

Other less detailed analyses looked at the possible conversion of the building to condominiums or office spaces. The building's characteristics as a school (wide hallways, auditorium and theater spaces, storage and unusable spaces) resulted in the conclusion that more than \$4 million would be required to adapt the building to these purposes. Because the building is situated in the center of the property, additional development would be severely restricted. This would result in the continuation of the characteristically under-developed nature of central Twinsburg. It would also ignore goals established in the City's Comprehensive Plan that call for a more walkable, mixed use, and sustainable central area.

In 2014, the City applied for a "Certificate of Appropriateness" for the demolition of the building. City staff worked with the Twinsburg Historical Society to identify elements of the building that could be saved and preserved in the Historical Society's collections. Also identified were building components, including the sandstone entry and carved stone medallions, and others that the City has committed to remove for preservation or to be utilized as components in new site development. The certificate was granted by the City's Architectural Review Board with conditions related to preservation of elements noted.

The identification of ACM's in the Old School structure have resulted in the property being vacant, pending the ultimate removal or mitigation of related hazards. As the property sits vacant in the central area of the City, it discourages investment in adjacent properties. Negative environmental impacts are possible in that some of the ACM's in the building are friable if disturbed. However, a larger perception of decline is present as the building sits vacant.

b. Impacts on Targeted Community

- i. Public Health - The City of Twinsburg is making every effort to limit any potential harm to the public health and welfare which might occur from the hazardous material contained in the property. However, we can't guarantee that a person entering the building would not be exposed to potential harm, particularly if no protective measures were employed and asbestos containing materials were to be damaged in the act of theft or vandalism. As a result, the building has been secured to the extent possible. The Police department schedules regular

inspections to discourage its occupancy by vagrants or unauthorized persons, as well as, to constantly monitor for broken windows, signs of entry or vandalism.

The building remains an attractive nuisance. Not all sides of the building are visible from the surrounding roadways. Vandals have gained access in the past. Fortunately, the high traffic nature of the area somewhat discourages malicious activity.

ii. Cumulative Brownfield Issues - Twinsburg has been disproportionately impacted by brownfields. In addition to the Old School property, the former Chrysler Twinsburg Stamping Plant property has caused the community substantial cost, effort and concern. As was mentioned previously, the City is only now recovering from the plant closure and property cleanup. The former Chrysler property included 2.2 million square feet of aging, abandoned, obsolete industrial building on the main entry to the City. It has taken six years to address the brownfield problem at this site. While the brownfield issues have been mitigated, the City has yet to recover from the financial losses associated with the closing and its aftermath. But with the resolution of this problem, the City can now turn its attention to redevelopment issues in the heart of the community.

c. Financial Need

i. **Economic Conditions** – Substantial investment will be required by the City to assist in the re-development and densification of central Twinsburg. This investment will include improvements in public infrastructure like roads, water lines, sewers, storm water facilities and other public realm expenses to support even larger investments by the private sector in buildings and related improvements. The financial assistance requested in this application will support a small portion of the overall costs to resolve the issues with this property and central Twinsburg. Asbestos mitigation is only the first step to achieve site cleanup and to establish sustainable long term land uses, and is one of the few where financial assistance is available (US EPA Brownfield Cleanup Program). The City will be required provide match money for this asbestos mitigation effort. Beyond this, the City will be required to foot the bill for essentially all of the remaining costs for cleanup and re-use.

The City's income tax rate has just recently been reduced back to the 2% rate that was in place prior to the closure. While in effect (2011-2013), the .25% increase enabled the City the ability to continue operations and amass a reserve fund. The elimination of the .25% increase has impacted the City more than expected resulting in a significant decline over the last two years. The trend in income tax collections from 2008 to 2015 is illustrated in the following:

	Year							
	2008	2009	2010	2011	2012	2013	2014	2015
Income Tax Collected (\$000's)	\$17,905	\$17,175	\$18,916	\$19,967	\$23,148	\$25,059	\$22,878	\$19,000

Source: City of Twinsburg audited financial statements 2008-2015

Because of recent setbacks like the Chrysler closure and uncertainty in the City's future income tax flows, the City needs to manage its financial resources wisely. While the tax losses associated with the plant closure have been absorbed, total revenues have not increased relative to those experienced six years ago. In the interim, the costs of operating the City have continued to increase. Therefore, the City is no better off financially now that it was immediately before the closure.

ii Effects of Brownfields - The Old School brownfield has real impacts on the adjacent property owners and on the image of the community. The hulking three-story structure, with broken windows and asbestos hazards, discourages investment in nearby properties. In addition to the blighting influence, this vacant property represents lost revenue and business opportunities in the heart of the City. If cleaned and re-used, the site could provide housing and employment opportunities in addition to an increased property tax base. Instead, it costs the City manpower and money to combat and monitor its gradual decay and discourage malicious activity.

The City's updated Comprehensive Plan concentrated much of its effort on central Twinsburg. The plan recognized the strategic importance of this property as well as its potential as a catalyst for broader redevelopment of under-utilized properties. If redeveloped consistent with the Concept Plan for Central Twinsburg, its 2.6 acres could provide housing and job opportunities. Site redevelopment would enable at least 30 residential units of various price points and 17,500 s.f. of commercial building space. This would provide about \$8 million in property value and more than \$130,000 in annual property tax revenue, the majority of which goes to the Twinsburg School system.

If the site provided the stimulus for adjacent property redevelopment, as reflected in the Comprehensive Plan, more than \$22 million in property value and more than \$430,000 in annual property taxes could be generated. As many as 88 new housing units could be provided in this southeast quadrant of central Twinsburg. The result would be a more sustainable mixed use area with access to the Tinkers Creek corridor and service from Akron Metro Transit system.

Failure to implement any improvement in the subject property will result in individual un-coordinated redevelopment of adjacent parcels, at best, and,

perpetuation of the continued decline of the Southeast Quadrant of Central Twinsburg at worst.

2. Project Description and Feasibility

a. Project Description

- i. Existing Conditions - The subject property was described in 1(a)(iii) of this narrative. The 54,000 s.f. building has been used for several purposes over the years but was vacated in 2012. Prior to its vacation, it exhibited signs of deferred maintenance, structural and physical obsolescence. Aging infrastructure including plumbing systems, electrical systems, roof materials, steel window lintels, etc, were in need of significant upgrade or replacement. The building was partially ADA accessible. Re-occupancy will require substantial investment. No public purpose has been identified for the space if it were to be re-occupied.

The City commissioned a code compliance survey, an Americans with Disabilities Act Accessibility Survey, a Phase 1 and Phase 2 Environmental Assessment and Asbestos Survey. The Phase 2 Environmental Assessment identified the existence of a fuel oil storage tank which was removed in 2013 in compliance with all appropriate regulations.

The asbestos survey identified significant asbestos containing materials (ACM's) within the structure. The identification of ACM's, in association with the other maintenance and updating issues presented significant obstacles to the re-occupancy of the building. As a consequence, the building has remained vacant.

An update of the City's Comprehensive Plan resulted in the preparation of concept plans for redevelopment of the under-developed lands within the City's central business district. This Southeast Quadrant contains over 15 acres of land. Only three former homes which have been converted to offices, two small commercial buildings and the subject property exist here, even though the property lies adjacent to the City's busiest central arterial intersection.

The City formed a Community Improvement Corporation which has been charged with the responsibility of working with adjacent property owners to facilitate a larger coordinated redevelopment effort consistent with City's Comprehensive Plan. The Plan, which resulted from a two-year effort, included identification of community goals and objectives, alternative analysis, identification of priority areas and community involvement.

- ii. Proposed Cleanup Plan – The proposed Cleanup Plan will result in the removal of all asbestos from the Old School structure. Methods of

mitigation to be employed will be consistent with federal, state and local regulations. ACM's will be removed by an Ohio Department of Health (ODH) Asbestos Hazard Abatement Contractor using appropriate protocols as specified in applicable regulations.

b. Task Description and Budget

- i. Tasks – The following provides a summary of tasks anticipated to be undertaken in this project. Task descriptions include work that will take place as a result of the grant as well as services that will be required to carry out eligible items that will be funded by sources other than grant monies :

Task	Duration (days)	Description
1	60	Finalize community relations plan / establish admin. record
2	30	Secure EPA Technical Services / CP Services
3	90	Finalize ABCA / Quality Assurance Project Plan
4	30	Prepare cleanup specifications
5	45	Bid cleanup services
6	30	Select contractor
7	30	Coordinate with agencies/utilities
8	90	Contractor performs mitigation services
9	30	Cleanup report

For purposes of project administration and costs estimating the following overall budget table is provided:

Overall Project Cost by Task in Dollars (see above for task description)

Category	Task Number									Total
	1	2	3	4	5	6	7	8	9	
Personnel	\$ 4,726	\$ 185	\$ 0	\$ 0	\$ 1,112	\$ 278	\$ 185	\$ 0	\$ 371	\$ 6,858
Fringe benefits	\$ 1,924	\$ 75	\$ 0	\$ 0	\$ 453	\$ 56	\$ 76	\$ 0	\$ 151	\$ 2,584
Contractual	\$ 0	\$ 0	\$ 6,000	\$ 4,000	\$ 0	\$ 0	\$ 0	\$ 240,000	\$ 0	\$ 240,000
Total Federal	\$ 0	\$ 0	\$ 4,800	\$ 3,200	\$ 0	\$ 0	\$ 0	\$ 192,000	\$ 0	\$ 200,000
Cost Share	\$ 9,093	\$ 260	\$ 1,200	\$ 800	\$ 1,565	\$ 334	\$ 261	\$ 48,000	\$ 522	\$ 62,035
Total Budget	\$ 9,093	\$ 260	\$ 6,000	\$ 4,000	\$ 1,565	\$ 334	\$ 261	\$ 240,000	\$ 522	\$ 262,035

\$ ---,000 – Highlight indicates grant funded item

- ii. Budget Table – The following Budget Table provides cost estimates for each **grant funded task**. Grant funds are anticipated to be devoted to three areas of contracted services: 1) Certified professional services related to finalizing the ABCA and conducting a Quality Assurance Project Plan; 2) Professional services related preparation of cleanup specifications; and, 3) asbestos mitigation by a qualified contractor. The budget table for grant funded tasks is as follows:

Task	Description	Federal Share	Local Share	Total
3	Finalize ABCA / Quality Assurance	\$ 4,800	\$ 1,200	\$ 6,000
4	Cleanup Specifications	\$ 3,200	\$ 800	\$ 4,000
8	Contracted mitigation services	\$192,000	\$ 48,000	\$240,000
Totals		\$200,000	\$ 50,000	\$250,000

c. **Ability to Leverage**

- i. Other Sources of Funding – The Twinsburg Community Improvement Corporation (TCIC) has been established to promote and support the redevelopment of Twinsburg’s central area and to act as an economic development partner with the City. The TCIC has committed \$20,000 to support asbestos removal related activities. A letter of support, which includes a commitment for funding, is included in the Attachments.
- ii. Sources of Funding for Future Cleanup Activities – Other sources for potential funding of subsequent cleanup activities have been identified and may be pursued following successful asbestos mitigation. These sources include a grant for up to \$50,000 from the Summit County Land Reutilization Authority for demolition activities. In addition, Ohio EPA has indicated the possible availability of Revolving Loan Fund assistance through the small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118) which may also be pursued following successful asbestos mitigation.

3. Community Engagement and Partnerships

a. **Plan for Community and Stakeholder Involvement**

- i. Stakeholder involvement –Stakeholders in the context of this project include City departments currently responsible for maintenance and safety at the project site, the adjacent property owners who are impacted by the existence and image of the large vacant structure, and businesses in the proximity of the site who are also impacted by the existing site conditions, as well as, by the site’s future potential. While residents and tax payers are stakeholders in the project by the public ownership of the site, they will be involved in the context of the larger community.

Adjacent property owners have already been directly engaged in this issue. Discussions have included the current status of the site, the potential for site development, and the potential for collateral development that might include a coordinated development plan which could, if they wished, involve their properties. The TCIC has also engaged adjacent property owners to explore the potential for the purchase of their adjacent properties in order to achieve the coordinated development objective.

Should the City be successful in mitigating asbestos from the subject property, the potential for site redevelopment will be enhanced, as will the interest of adjacent property owners and businesses. Partnering with the Twinsburg Community Improvement Corporation, we will provide periodic press releases to the local newspaper encouraging communications, providing contacts for communications, and providing progress reports. Both the City and the TCIC have websites which are capable of providing information and accommodating communications. These channels will also be utilized.

- ii. Resident concerns – While the subject property is removed from residential areas, it is in close proximity to businesses and activities in the central business district. In order to acquire and react to concerns the City will establish a hotline for concerns related to the proposed cleanup activities. Further, the manner and process of communicating concerns will be presented at Council meetings, be posted on City and TCIC websites, and published in press releases. Two articles have been written and published in the local newspaper since the Community Information Notice was posted. As mitigation activities will be performed primarily inside the structure, potential exposure should be limited. All work will be conducted by trained and certified contractors. Oversight from the City, the Akron Regional Air Quality Management District, and our project consultants, should assure protection of sensitive populations.
- b. **Partnerships with Government Agencies**
The Ohio EPA Office of Site Assistance and Brownfield Revitalization, the Northeast District Office of Ohio EPA and the Akron Regional Air Quality Management District will provide various levels of assistance and oversight associated with asbestos mitigation. While EPA will be providing technical assistance, the Akron Regional Air Quality Management District has primary responsibility for monitoring and enforcement of air pollution issues and will be involved in this project.
- c. **Partnerships with Community Organizations**
The City of Twinsburg is partnering with the Twinsburg Community Improvement Corporation (TCIC) in the implementation and execution of

this project. The TCIC will not only provide support for this effort, but it will also contribute financial assistance. The TCIC has been charged by the City with the task of working with area property owners to attempt to leverage redevelopment efforts to include collateral investment. A letter of support and commitment is attached.

4. Project Benefits

a. Health, Welfare and Environmental Benefits

- i. Health and Welfare – The proposed project will provide both immediate and long term health and welfare benefits. Immediate benefits will result from asbestos hazard removal. Long-term benefits resulting from the elimination of the hazardous materials will pave the way for redevelopment/ revitalization investment. Removal of a blighting influence, stimulation of economic activity, employment opportunities from site redevelopment, as well as increased property tax revenues will be among the public welfare benefits.
- ii. Environmental Benefits – The many ultimate environmental benefits from the cleanup and revitalization of the subject property would not be possible without the proposed initial hazardous material removal. The challenges associated with redevelopment of brownfield properties are well documented and are cost intensive. Costs associated with hazardous material removal represent the primary challenge to achieving environmental benefits at this site.

If the City is successful in addressing the costs associated with this effort, not only will the public hazard be removed, the opportunity will exist to integrate public open space elements into the central area.

b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

- i. Policies, Planning – The City of Twinsburg is nearing built-out condition. In recognition of this and, in an effort to assure sustainable and equitable development practices, the City's recently completed Comprehensive Plan update provided specific goals and planning emphasis on the City's central area. This effort benefited by technical assistance from the Partnership for Sustainable Communities Project for Public Places. The subject site is located in a new mixed use development district lying in the heart of the City's infrastructure network. The City's planning policies and practices embrace sustainable development practices and livability principals, including complete streets and walkable community policies.
- ii. Integrating Equitable Development/Livability Principals - This project is an effort to implement sustainable and equitable practices that were identified in the planning process and through technical assistance provided. Specifically, this project will support existing communities and

reduce greenfield land development. It will mitigate environmental conditions by effective deconstruction, provide improved access to greenspace for all residents, provide improved employment and housing opportunities to the City's increasingly diverse population, and will contribute to a more attractive community with an improved image and sense of place.

c. Long-term Economic and Community Benefits

- i. Economic Benefits - Site redevelopment would enable at least 30 residential units of various price points and 17,500 s.f. of commercial building space. This amount of development would provide about \$8 million in property value. This value would result in more than \$130,000 in annual property tax revenue, the majority of which goes to the Twinsburg School system.

If the site provided the stimulus for adjacent property redevelopment, as reflected in the Concept Plan, more than \$22 million in property value and more than \$430,000 in annual property taxes could be generated and as many as 88 new housing units could be provided in the redevelopment of this southeast quadrant of central Twinsburg. This development would be a more sustainable mixed use area with access to the adjacent Tinkers Creek corridor and service from Akron Metro Transit system.

- ii. Job Creation Potential – Job creation activities related to the funded components of this project would be limited to those needed to perform contracted services including certified professional and mitigation contracted services. The City, through its Human Resources Department, will solicit information from contractors regarding their staff needs (if any) and will work with area workforce development agencies to secure potential candidates for their consideration. Long-term job creation benefits will result from ultimate redevelopment, which could provide anywhere from 35 to 75 new jobs with \$1.2 to \$2.6 million in wages, depending upon the extent of redevelopment achieved.

5. Programmatic Capability and Past Performance

a. Programmatic Capability

- i. Organizational Structure – A variety of City staff will be utilized to ensure timely and successful expenditure of funds. The primary contact and project director will be the City's Director of Community Planning and Development. This individual has more than 30 years experience in the acquisition, administrative and financial aspects of federal grant and loan programs. His most recent responsibility included the project management and oversight for the City's Clean Ohio Revitalization Fund (CORF) cleanup and redevelopment effort at the former Chrysler

Twinsburg Stamping Plant. Financial aspects, including payment processing and reimbursement, will be managed by the City's Finance Director. She is a CPA/MBA with more than 20 years experience in public and private sector accounting and finance.

- ii. Additional Expertise – Should the request for Cleanup funds be successful the City will obtain the services of a “Certified Professional” to assist with technical aspects of the effort including the finalization of the ABCA, Quality Assurance and specification preparation. These services will be acquired via a competitive qualifications based selection process consistent with federal procurement practices.

b. Audit Findings

The City has processed millions of dollars of federal and State financial assistance provided through a variety of agencies and programs and has had no adverse audit findings.

c. Past Performance

Twinsburg has received Brownfield Assessment assistance through the Northeast Four County Regional Planning and Development Agency (NEFCO) FY 12 U.S. EPA Brownfield Assessment Coalition grant. This was NEFCO's first brownfield project that to involve leveraging of local funds. These activities were related to site assessments at the subject property. Accomplishments included the completion of Phase 1 and Phase 2 Environmental Assessments, Asbestos Survey, and removal of a large on-site underground fuel oil storage tank, as well as, related soil and ground water sampling.

The City has also received and successfully executed a major brownfield cleanup effort at the former Chrysler Twinsburg Stamping Plant property which was funded by the Clean Ohio Revitalization Fund program. This effort has resulted in the cleanup of a 165 acre industrial site burdened by a 2.2 million square feet of vacated industrial building.

ATTACHMENTS

Twinsburg, Ohio Cleanup Grant Proposal “Old School” Asbestos Mitigation

Attachment 3a – Threshold Eligibility / Cost Share

Threshold Eligibility Narrative

Property Deed

Resolution 151-2015

Attachment 3b – Letter from State Authority

Attachment 3c – Letters from Community Organizations

Twinsburg Community Improvement Corporation

County of Summit, Ohio

Summit County Land Bank

Northeast Ohio Four County Regional Planning
& Development Organization

Attachment 3d – Leveraged Funds

Twinsburg Community Improvement Corporation

Attachment 3e – Community Notification

Community Notification Advertisement

Comments and Responses

Sign-in Sheet

Attachment 3f – Draft Analysis of Brownfield Cleanup Alternatives

ATTACHMENTS

Attachment 3a – Threshold Eligibility / Cost Share
Threshold Eligibility Narrative
Property Deed
Resolution 151-2015

ATTACHMENT 3a
THRESHOLD ELIGIBILITY / COST SHARE

Threshold Eligibility

Site Eligibility

a. Basic Site Information (See also letter of transmittal).

Name of Site: Twinsburg Old School

Address: 8997 Darrow Road

Twinsburg, Ohio 44087

Current Owner: City of Twinsburg

- b. Status and History of Contamination at the Site** - Hazardous materials were utilized in the original construction of the building and the current owner has had no responsibility for their original existence nor has any hazardous substance been deposited at the site, or released at the site, by the actions of the City of Twinsburg. The subject site is owned in fee simple by the City of Twinsburg (see the attached deed) having been acquired from the Twinsburg City School system in 1996. While the age of the property was known, there was no obvious contamination. A "Facilities Analysis Study" completed in March, 1993 failed to identify any contamination issues.
- c. Sites Ineligible for Funding** – The subject site is not listed or proposed for listing on any National Priority List, nor is it subject to any order or decree under CERCLA, nor is it subject to jurisdiction or control by the United States Government.
- d. Sites Requiring a Property-Specific Determination** – Not applicable.
- e. Environmental Assessment Required for Cleanup Proposals** – Phase 1, Phase 2 and an Asbestos Survey have been prepared for the subject building and property. A Phase 2 Assessment and Asbestos Survey were prepared in June, 2014, and in November, 2012, respectively.
- f. CERCLA 107 Liability** - The City of Twinsburg has previously received assistance for environmental assessments, an asbestos survey, as well as, for the removal of a fuel oil storage tank. This assistance was provided through a US EPA Brownfield Assessment Coalition Grant administered by the Northeast Four County Regional Planning and Development Agency (NEFCO). At that time, the status of the City as an "innocent landowner" liability defense was determined.
- g. Enforcement or other actions** – No enforcement or actions are ongoing or anticipated.
- h. Liability and Defenses** – See b. and f. above.

Cost Share

See Resolution 151-2015 (following the deed)

OR2244- 454

195146

U.R. _____ PG. 454-457

RECEIVED

APR 12 1952

RECEIVED - CLERK

FEE \$ 14/8

MAIL TO:

DOCUMENT NUMBER

OFFICIAL RECORD
(DO NOT REMOVE FROM RECORD
(PAGE 1 OF RECORD)



Guardian Title

Know all men by these presents, That TWINSBURG CITY SCHOOL DISTRICT
BOARD OF EDUCATION

the Grantor,
 who claim title by or through instrument, recorded in Volume _____ Page _____ County
 Recorder's Office, for the consideration of ---Ten and no/100--- Dollars
 (\$ 10.00) received to its full satisfaction of THE CITY OF TWINSBURG, OHIO,
 the Grantee,
 whose TAX MAILING ADDRESS will be 10075 Ravenna Road
Twinsburg, OH 44087

have given, granted, remised, released and forever quit-claimed, and do by these presents absolutely
 give, grant, remise, release and forever quit-claim unto the said Grantee, its heirs and assigns
 forever, all such right and title as it, the said Grantor, have or ought to have in and to
 the following described piece or parcel of land, situated in the _____ City _____ of
Twinsburg County of Summit and State of Ohio

PARCEL N° 1
 Situated in the City of Twinsburg, County of Summit and State of Ohio;
 and known as being a part of Lots 15 and 16, Tract 1 N., (formerly Twinsburg Township),
 and is bounded and described as follows:

Beginning at a point in the center line of Chamberlin Road which is the Westerly
 line of said Lots 15 and 16, and a point being S. 2 deg. 30' W., 1320.35 feet and S. 1 deg. 50'
 W., 398.46 feet, both courses being along said Westerly line of said Lot No. 16 and
 measured from the Northwestern corner of said Lot No. 16; thence S. 1 deg. 41' W. along
 said center line of Chamberlin Road and along the Westerly lines of said Lots 16 and 15,
 1459.00 feet to the principal place of beginning; thence N. 89 deg. 26' 40" E., parallel with
 the Southerly line of the O. E. Chamberlin Farm, 1089.83 feet; thence N. 1 deg. 41' E.,
 parallel with said center line of Chamberlin Road, 1602.83 feet to the Southerly line of land
 conveyed to Otto and Emily Sindelar as recorded in Vol. 1034, Page 567 of Summit County
 Deed Records; thence N. 89 deg. 41' E., along said Southerly line 724.00 feet; thence S. 0
 deg. 59' 23" W., 1162.55 feet to the Northwestern corner of land conveyed to Gustav
 Juhnke as recorded in Vol. 293, Page 316 of Summit County Deed Records; thence S. 1
 deg. 14' 30" W., along the Westerly line of land conveyed to said Juhnke, 473.45 feet;
 thence S. 89 deg. 26' 40" W., parallel with and being 40 feet measured Southeasterly by
 right angular measurement from the first described course of this parcel, 1831.82 feet to
 said center line of Chamberlin Road; thence N. 1 deg. 41' E., along said centerline 40.04
 feet to the principal place of beginning and containing 28.64 acres of land.

EXCEPTING, HOWEVER, FROM THIS PARCEL THE FOLLOWING DESCRIBED
PARCEL:

Situated in the City of Twinsburg, County of Summit and State of Ohio, and
 known as being part of original Lot 15, Tract 1-N, formerly Twinsburg Township, further
 bounded and described as follows, to-wit:

Beginning at a point in the center line of Chamberlain Road, and the West line of
 original Lot 16 in said original Tract 1-N, which point is S. 2 deg. 30' W., 1320.35 feet from
 the Northwest corner of said parcel original Lot 16; thence S. 1 deg. 50' W., along the
 center line of said Chamberlin Road and the West line of said original Lot 16, 398.46 feet to
 an angle point; thence S. 1 deg. 41' W., continuing along the center line of said Chamberlin
 Road to the West line of said original Lots 16 and 15, 1499.00 feet to a point and the
 Northwest corner of a 28.64 acre parcel of land conveyed to W. B. and C. A. Dawson by
 deed recorded in Vol. 2327, Page 419 of Summit County Records and the true place of
 beginning of the land herein described.

Thence N. 89 deg. 26' 40" E., parallel to and 40.00 feet North of the South line of
 said 28.64 acres parcel of land, a distance of 1089.83 feet to an iron pin; thence N. 1 deg. 41'

(LEGAL DESCRIPTION CONTINUED ON ATTACHED PAGE)

GUARDIAN TITLE
 ORDER NO. 96-604080 (PC 1+2)
 96-604076 (PC 3)

8-21-96 Day
 Description Approved By
 TAX MAP DEPARTMENT
 TW/1

OR2244- 456

To have and to hold the premises aforesaid, with the appurtenances thereto belonging, to the said grantee, its heirs and assigns, so that neither the said grantor, nor its heirs, nor any other persons claiming title through or under it, shall or will hereafter claim or demand any right or title to the premises, or any part thereof; but they and every one of them shall by these presents be excluded and forever barred.

In Witness Whereof, we have hereunto set our hands, the 2 day of July, in the year of our Lord one thousand nine hundred and ninety-six.

Signed in the presence of:
Jeffrey L. Miller
Gary L. Pierce
 Gary L. Pierce

TWINSBURG CITY SCHOOL DISTRICT
BOARD OF EDUCATION
 By: C. William King
 C. William King, President
 By: Joseph A. Kay
 Joseph A. Kay, Treasurer

The State of Ohio, Before me, a Notary Public
Summit County, In and for said County and State, personally appeared
 the above named TWINSBURG CITY SCHOOL DISTRICT BOARD OF EDUCATION, by
C. William King, President and Joseph A. Kay, Treasurer
 who acknowledged that they did sign the foregoing instrument and that the same is their free
 act and deed.



In Testimony Whereof, I have hereunto set my hand and official seal, at
Twinsburg, Ohio, this 2 day of
July, A. D. 1996.

This instrument prepared by:
 CHRISTLEY HETTINGER & PENCE
 215 WEST CARFIELD ROAD
 SUITE 230
 AURORA, OHIO 44202-8848

GARY L. PIERCE, Notary Public
 Notary Public for State of Ohio
 My commission expires on 12/31/97
 Sec. 1-7.01 R.C.

QUIT-CLAIM DEED
 FROM
TWINSBURG CITY SCHOOL DISTRICT
BOARD OF EDUCATION
 TO
THE CITY OF TWINSBURG, OHIO
 RECEIVED FOR RECORD
 at 11 o'clock A.
 Recorded 10
 in County Records
 Volume Page
 ENTERED FOR TRANSFER
 14430
 TRANSFERRED IN COMPLIANCE WITH
 SEC. 219.202 REV. CODE
 s. James D. McCarthy Notary Public
 JAMES D. MCCARTHY Notary Public
 My commission expires on 12/31/97
 Sec. 1-7.01 R.C.

This instrument prepared by:
 CHRISTLEY HETTINGER & PENCE
 215 WEST CARFIELD ROAD
 SUITE 230
 AURORA, OHIO 44202-8848

(LEGAL DESCRIPTION CONTINUED FOR TWINSBURG BOARD OF EDUCATION
to CITY OF TWINSBURG QUIT-CLAIM DEED)

E., parallel to the West line of said original Lot 15, a distance of 400.00 feet to an iron pin; thence N. 89 deg. 26' 40" E., parallel to the South line of said 28.64 acre parcel of land, a distance of 396.00 feet to an iron pipe; thence S. 1 deg. 41' W., parallel to the West line of said original Lot 15, a distance of 440.00 feet to an iron pipe in the South line of said 28.64 acre parcel of land; thence S. 89 deg. 26' 40" W., parallel with and being 40 feet measured Southeasterly by right angular measurement from the first described course of this parcel, a distance of 1485.83 feet to a point in the West line of said original Lot 15 and the center line of said Chamberlin Road; thence N. 1 deg. 41' E., along the West line of said original Lot 15 and the center line of said Chamberlin Road, a distance of 40.03 feet to the true place of beginning and contains five (5) acres of land, be the same more or less but subject to all legal highways, and reserving the right to use the South 40.00 feet of the above described land, for road purposes of ingress and egress from Chamberlin Road to and from the land lying East of and adjacent to the above described five (5) acres, as surveyed by W. S. Mathews in December, 1956. Subject to Perpetual Easement to State of Ohio May 31, 1963.

PARCEL NO. 2

Situated in the City of Twinsburg, County of Summit and State of Ohio; and known as being part of Lots No. 15 and 16, Tract No. 1-N and is bounded and described as follows:

Beginning at a point in the West line of said Lot No. 16, which is South 2 deg. 30' West, 1320.35 feet and South 1 deg. 50' West, 398.46 feet, both courses being along said West line of Lot No. 16 and measured from its Northwest corner, said beginning point also being North 89 deg. 30' West 25.01 feet from an iron pin on the East line of the Matti Road (50 feet wide); said point being also the Northwest corner of land conveyed to Adda Reihl by deed recorded in Volume 2374, Page 428 of Summit County Record of Deeds; thence South 89 deg. 30' East along the South line of Marek's land, 586.52 feet; thence North 1 deg. 53' East, 116.75 feet; thence North 89 deg. 41' East, 1226.01 feet to the Northeast corner of premises conveyed to W. B. and Christine A. Dawson by deed recorded in Volume 2327, Page 417, Summit County Records of Deeds and the true place of beginning for the premises herein to be described:

Thence South 0 deg. 55' 23" West along said Dawson's East line, 1162.55 feet; thence South 1 deg. 14' 30" West 473.45 feet; thence North 89 deg. 26' 40" East about 123.61 feet to the East line of said Lot No. 15; thence North 1 deg. 14' 30" East 473.45 feet; thence North 0 deg. 59' 23" East a distance of 1162.55 feet; thence North 89 deg. 41' West, a distance of 123.61 feet to the place of beginning and containing about 4.45 acres of land more or less but subject to all legal highways. *pages 162 p.m. 64-0014*

ADDING THERETO, THE FOLLOWING DESCRIBED PARCEL:
PA. TW - 0006 - 02 - 031

PARCEL NO. 3

Situated in the City of Twinsburg, County of Summit and State of Ohio and known as being a part of Lots Nos. 15 and 16, Tract 1, North, formerly Twinsburg Township, and is bounded and described as follows: Beginning at a point in the centerline of Chamberlin Road (60 feet wide) on the West line of Lot No. 16 in said township and Tract, which point is South 2 deg. 30' West, 1320.35 feet and South 1 deg. 50' West, 398.46 feet, both courses being along said West line of Lot No. 16 and measured from its Northwest corner; thence South 1 deg. 41' West, measured along the West line of said Lot 16 and along the center line of Chamberlin Road, 899 feet to the principal place of beginning; thence continuing in the same direction and along said center line of Chamberlin Road, 100 feet; thence North 89 deg. 26' 40" East, parallel with the Southerly line of the Chamberlin Farm, 1089.83 feet; thence North 1 deg. 41' East, parallel with said center line of Chamberlin Road, 100 feet; thence South 89 deg. 26' 40" West, parallel with the second described course, 1089.83 feet to the principal place of beginning, be the same more or less, but subject to all legal highways.

Above parcel subject to perpetual easement to State of Ohio for highway purposes, recorded in Volume 4155, Page 533, of Summit County Records.

p.m. 64-00110

p.m. TW-0006-02-021

STATE OF OHIO)
)
CITY OF TWINSBURG)
COUNTY OF SUMMIT)

CERTIFICATION

I, SHANNON COLLINS, do hereby certify that I am the duly appointed, qualified Clerk of Council of the City of Twinsburg, Ohio, and that the attached is a true and exact copy of RESOLUTION 151-2015 adopted by Council of the City of Twinsburg at their Regular Meeting on December 8, 2015.

That publication of RESOLUTION 151-2015 will be posted in accordance with requirements stated in the City Charter. The resolution was read on the following date, December 8, 2015; and that such RESOLUTION is of record in the 2015 Legislation Records of the City of Twinsburg, Ohio.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the official seal of the City of Twinsburg, this 11th day of December, 2015.



Shannon Collins
Clerk of Council

CITY OF TWINSBURG, OHIO

RESOLUTION 151-2015

COPY

A RESOLUTION AUTHORIZING THE MAYOR TO PREPARE AND SUBMIT A MATCHING GRANT FUND APPLICATION TO THE U.S. EPA BROWNFIELD CLEAN-UP PROGRAM; AND DECLARING AN EMERGENCY

WHEREAS, the U.S. EPA Brownfield Clean-Up Program has an application process to be followed for the issuance of funds for asbestos mitigation funding programs; and

WHEREAS, the City has identified specific areas that would benefit from available asbestos mitigation funding located at 8997 Darrow road.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Twinsburg, County of Summit and State of Ohio:

SECTION I: The City, by and through the Director of Community Development and Planning, is hereby authorized to make application for and provide supporting petitions to the U.S. EPA Brownfield Clean-Up Program for grant funds for asbestos mitigation at property owned by the City located at 8997 Darrow Road providing for a twenty percent (20%) City fund match in an amount not to exceed \$50,000.00.

SECTION II: It is found and determined that all formal actions of this Council concerning and relating to the adoption of this Resolution were taken in an open meeting or meetings of this Council and any of its committees that resulted in such formal action, were in meetings open to the public and in full compliance with all legal requirements, including without limitation, those set forth in section 121.22 of the Ohio Revised Code.

SECTION III: This Resolution is hereby declared to be an emergency measure, necessary for the immediate preservation of the public peace, health, safety, welfare and convenience of the citizens of the City of Twinsburg, and for the additional reason that the application is due on or before December 18, 2015. Provided it receives the affirmative vote of five or more members of Council, it shall take effect and be in force immediately upon its passage and approval of the Mayor; otherwise, it shall take effect and be in force at the earliest period allowed by law.

PASSED: 12-8-15

APPROVED: 12-8-15



Sam Scaffide, President of Council


Submitted to the Mayor for approval this
8th day of December, 2015

Approved by the Mayor 12/8, 2015



Ted Yates, Mayor

ATTEST:

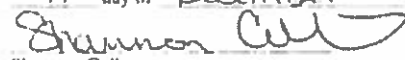


Shannon Collins
Clerk of Council

Passed: 12-8-15
Yes 7 No 0

CERTIFICATE OF POSTING

I, Shannon Collins, Clerk of Council, of the City of Twinsburg, State of Ohio, do hereby certify that publication of the foregoing ordinances, resolutions was duly made by posting true copies thereof at five of the most public places in said City as determined by Section 113.02 of the Codified Ordinances of the City of Twinsburg, each for a period of fifteen days commencing on the 11 day of December, 2015.



Shannon Collins
Clerk of Council
City of Twinsburg

ATTACHMENTS

Attachment 3b – Letter from State Authority



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

December 3, 2015

U.S. Environmental Protection Agency, Region 5
ATTN: Matthew Didier
77 West Jackson Blvd., Mail Code SE-7J
Chicago, IL 60604-3507

RE: City of Twinsburg Cleanup Grant Proposal

Dear Mr. Didier:

I am pleased to offer Ohio EPA's support for the City of Twinsburg Cleanup Grant Proposal. The City is applying for a cleanup grant totaling \$200,000 to address hazardous substance contamination. We have worked with Ohio's brownfields in the past and hope to be able to provide support to the City of Twinsburg under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118).

The funding the City of Twinsburg is requesting under their cleanup grant proposal will be used to remove asbestos hazardous materials from a former school facility currently owned by the City. The property is located in the central business district of the City and the building consists of two sections, one built in 1921 and the other in 1952. There is redevelopment potential for the property but it is burdened by the existence of hazardous asbestos material. If awarded, this funding would be a catalyst for the redevelopment of central Twinsburg and it would provide the opportunity to incorporate the City's multi-purpose trail network into the central area. Benefits of this project include the removal of hazards to increase the public health and safety of Twinsburg residents, increases in property valuation, and redevelopment of this parcel would directly contribute to the City's Comprehensive plan goals for mixed use, walkable and sustainable development of underutilized land in the central business district.

We look forward to working with the City of Twinsburg and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2285.

Sincerely,

Amy Yersavich, Manager
Ohio Environmental Protection Agency
Site Assistance and Brownfield Revitalization

cc: Larry E. Finch, Director Community Planning & Development, City of Twinsburg
Rod Beals, Ohio EPA, DERR/NEDO

ATTACHMENTS

Attachment 3c – Letters from Community Organizations

Twinsburg Community Improvement Corporation

County of Summit, Ohio

Summit County Land Bank

**Northeast Ohio Four County Regional Planning
& Development Organization**



December 1, 2015

Mayor Ted Yates
City of Twinsburg
10075 Ravenna Road
Twinsburg, Ohio 44087

Dear Mayor Yates:

The Twinsburg Community Improvement Corporation (TCIC) firmly supports the City's efforts to acquire financial assistance from the US EPA Brownfield Cleanup Program. This assistance would enable the City to mitigate asbestos hazards associated with the Old School property and would make it possible for further actions to be taken toward renovation or site redevelopment.

Currently, the Old School structure sits vacant in the middle of Twinsburg's central business district. We realize that the City has no need for additional public buildings. We also realize that the continued vacant status of the building can only contribute to its accelerated decline. Because this property is situated in the heart of central Twinsburg, this property has great potential to contribute to the economic activity the City. However, nothing can happen until the asbestos hazard existing in the building has been mitigated.

As evidence of our strong support for resolution of site issues at this property, the TCIC will contribute \$20,000 toward non-grant cost elements associated with a successful US EPA Brownfield Cleanup Grant application. We are all hopeful that this effort will result in the eventual re-purposing of this key central area property.

Sincerely,

A handwritten signature in blue ink that reads "Larry E. Finch".

Larry E. Finch, AICP
Executive Director



COUNTY OF SUMMIT, OHIO

Russell M. Pry, Executive

175 S. Main Street • Akron, Ohio 44308-1308 • 330.643.2510 • fax: 330.643.2507 • www.co.summit.oh.us

December 1, 2015

Mayor Ted Yates
City of Twinsburg
10075 Ravenna Road
Twinsburg, Ohio 44087

Dear Mayor Yates:

Please accept this letter of support for the City of Twinsburg's efforts to receive grant assistance through the US EPA Brownfield Cleanup Program. I understand the assistance would enable the City to mitigate asbestos hazards associated with the Old School property to make it possible for renovation or site redevelopment.

Twinsburg has done an amazing job in revitalizing the City and because this property is situated in the heart of central Twinsburg, it has great potential to contribute to furthering the economic vitality of the City. However, nothing can happen until the asbestos hazard existing in the building has been mitigated and I applaud your efforts to be proactive in finding a remedy for the hazard.

I strongly support your efforts and hope that you are successful in your grant application. Please let me know if there is anything else I can do for you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Russell M. Pry", is written over a horizontal line.

Russell M. Pry, Executive
County of Summit



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330.643.2546

SUMMITLANDBANK.ORG

Mayor Ted Yates
City of Twinsburg, Ohio
10075 Ravenna Road
Twinsburg, Ohio 44087

December 6, 2015

Dear Mayor Yates,

Please accept this letter as a commitment of support from the Summit County Land Bank in your efforts to acquire financial assistance from the FY2016 U.S. EPA Brownfields Cleanup Grant Program.

Assistance from the U.S. EPA Brownfields Cleanup Grant would enable the City of Twinsburg to mitigate the asbestos hazards associated with the vacant and blighted property located at 8997 Darrow Road, known as the old school property, in the City of Twinsburg, and would enable future renovation and site redevelopment. We are aware that the current, vacant status of this site has contributed to its decline in value and has become a significant source of blight in a key location in Twinsburg.

As agent for County of Summit in the reclamation, rehabilitation and reutilization of abandoned, vacant and blighted property in Summit County, the mission of the Summit County Land Bank is to support neighborhood and community reinvestment and economic development efforts in order to revitalize neighborhoods, stabilize property values, reduce blight, return property to productive use, and improve the quality of life in our community, and we are pleased to support your application for funding for the U.S. EPA Brownfields Cleanup Grant.

Sincerely,

Patrick Bravo
Executive Director

NEFCO

NORTHEAST OHIO FOUR COUNTY REGIONAL PLANNING & DEVELOPMENT ORGANIZATION

175 South Main Street, Room 211
Akron, Ohio 44308-1308

(330) 643-8514 • Fax (330) 643-5046
www.nefcoplanning.org

Richard Regula, Chairman

Joseph Hadley Jr., Executive Director

November 20, 2015

Mayor Ted Yates
City of Twinsburg
10075 Ravenna Road
Twinsburg, Ohio 44087

SUBJECT: Letter of support for Twinsburg's U.S. EPA cleanup grant application for the Old School property

Dear Mayor Yates:

The Northeast Ohio Four County Regional Planning and Development Organization (NEFCO) strongly supports the City of Twinsburg's application for a FY2016 United States Environmental Protection Agency (U.S. EPA) Brownfields Cleanup Grant for the Old School Property. This property was selected in 2014 for an environmental site assessment under NEFCO's FY12 U.S. EPA Brownfields Assessment Coalition grant. The partnership between Twinsburg and NEFCO to remove a large underground storage tank on the property and to complete the assessment was the first of NEFCO's brownfields projects that involved the leveraging of local funds.

The Old School, situated at the heart of the City, factors heavily into plans to create a walkable city and a safer intersection. NEFCO participated in a design workshop funded by an Office of Sustainable Communities grant to Twinsburg. From my participation at that event, it was evident that the reuse of unproductive properties such as the Old School that lie in the City's core is necessary to improve walkability, create a human-scaled community, and strengthen the economic viability of the city's center.

Redevelopment will support the goals of the Northeast Ohio Sustainable Communities Consortium, an effort funded by the U.S. Department of Housing and Urban Development. Two such goals are to improve fiscal health and to strengthen established communities. Assistance provided by the cleanup grant will also emphasize NEFCO's commitment to the reuse of vacant, blighted and contaminated sites in the region, and will leverage U.S. EPA dollars that were invested in this property. Twinsburg is also a community affected by the closure of a major auto plant. The closure of Twinsburg's Chrysler Stamping Plant in 2010 meant the significant loss of income and business tax receipts, as well as ongoing involvement by the city in the cleanup, demolition and reuse of the auto plant property, which once employed over 1,000 workers. The City has expressed interest in NEFCO's plans to apply for a U.S. EPA revolving loan fund grant, requesting to be considered for a loan to remove asbestos on the Old School property should

Mayor Yates
Page 2
November 20, 2015

NEFCO receive an award. NEFCO will also consider funding additional assessment activities that may be required prior to a cleanup. NEFCO firmly supports this application to the U.S. EPA and applauds the city for taking steps to promote a safe and walkable urban core.

Sincerely,

A handwritten signature in black ink, reading "Sylvia Chinn-Levy". The signature is fluid and cursive, with the first name "Sylvia" being more prominent and the last name "Chinn-Levy" following in a similar style.

Sylvia Chinn-Levy
Program Manager for Economic
Development Planning

ATTACHMENTS

Attachment 3d – Leveraged Funds

Twinsburg Community Improvement Corporation



December 1, 2015

Mayor Ted Yates
City of Twinsburg
10075 Ravenna Road
Twinsburg, Ohio 44087

Dear Mayor Yates:

The Twinsburg Community Improvement Corporation (TCIC) firmly supports the City's efforts to acquire financial assistance from the US EPA Brownfield Cleanup Program. This assistance would enable the City to mitigate asbestos hazards associated with the Old School property and would make it possible for further actions to be taken toward renovation or site redevelopment.

Currently, the Old School structure sits vacant in the middle of Twinsburg's central business district. We realize that the City has no need for additional public buildings. We also realize that the continued vacant status of the building can only contribute to its accelerated decline. Because this property is situated in the heart of central Twinsburg, this property has great potential to contribute to the economic activity the City. However, nothing can happen until the asbestos hazard existing in the building has been mitigated.

As evidence of our strong support for resolution of site issues at this property, the TCIC will contribute \$20,000 toward non-grant cost elements associated with a successful US EPA Brownfield Cleanup Grant application. We are all hopeful that this effort will result in the eventual re-purposing of this key central area property.

Sincerely,

A handwritten signature in blue ink that reads "Larry E. Finch". The signature is fluid and cursive, with the first name "Larry" and last name "Finch" clearly legible.

Larry E. Finch, AICP
Executive Director

ATTACHMENTS

Attachment 3e – Community Notification

Community Notification Advertisement

Sign-in Sheet

Meeting Summary

Comments and Responses

Daily NewspapersRecord-Courier • Alliance Review • Daily Record • Ashland Times-Gazette
Daily Jeffersonian • Crescent-News • State JournalWeekly NewspapersCuyahoga Falls News-Press • Stow Sentry • Hudson Hub-Times • Tallmadge Express
News Leader • Twinsburg Bulletin • Aurora Advocate • Gateway News • Barnesville
Enterprise

The Press-News • Holmes Country News • Loudonville Times • Newcomerstown News

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Description:	Start	Stop	Ins.	Cost / Day	Surcharges	Total
30 North Zone	11/26/2015	11/26/2015	1	28.80		28.80
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Internet Charge						1.50
Total:						30.30
Prepaid:						0.00
Total Due:						30.30

LEGAL NOTICE
City of Twinsburg Community
Notification
Intent to Apply for US EPA
Brownfield GrantTwinsburg, Ohio 44087 or email to
scollins@twinsburg.oh.us For ad-
ditional information, or to request
special accommodations to attend
the Public Meeting, call
330-963-6288.
NZ 11-25-15, #12082634

The City of Twinsburg intends to make application to the US Environmental Protection Agency for financial assistance through the Brownfield Cleanup Grant program. Grant assistance is being pursued to offset costs associated with asbestos mitigation at the property located at 8997 Darrow Road. A Public Meeting will be held on December 8, 2015 in the Council Chambers at 10075 Ravenna Road for the purposes of informing the community of the project and accepting public comment. A draft application and "Analysis of Brownfield Cleanup Alternatives", which summarizes the contamination issues, cleanup standards and laws, alternatives considered and recommended, is available on request from the Clerk of Council. Comments on the draft proposal will be accepted at the Public Meeting or by mail or email until 4:30 pm of December 16, 2015. Mail to "Brownfield Cleanup", 10075 Ravenna Road,

Posting

CITY OF TWINSBURG, OHIO
COMMUNITY NOTIFICATION MEETING
TUESDAY, DECEMBER 8, 2015

TIME: 6:30PM

PLACE: Twinsburg Government Center

- 1) Roll Call
- 2) Audience Participation
- 3) Agenda Items
 - a) Brownfield Grant Application

City of Twinsburg Community Notification
Intent to Apply for US EPA Brownfield Grant

The City of Twinsburg intends to make application to the US Environmental Protection Agency for financial assistance through the Brownfield Cleanup Grant program. Grant assistance is being pursued to offset costs associated with asbestos mitigation at the property located at 8997 Darrow Road. A Public Meeting will be held on December 8, 2015 in the Council Chambers at 10075 Ravenna Road for the purposes of informing the community of the project and accepting public comment. A draft application and "Analysis of Brownfield Cleanup Alternatives", which summarizes the contamination issues, cleanup standards and laws, alternatives considered and recommended, is available on request from the Clerk of Council. Comments on the draft proposal will be accepted at the Public Meeting or by mail or email until 4:30pm of December 16, 2015. Mail to "Brownfield Cleanup", 10075 Ravenna Road, Twinsburg, Ohio 44087 or email to scollins@twinsburg.oh.us. For additional information, or to request special accommodations to attend the Public Meeting, call 330-963-6288.

- 4) Miscellaneous
5. Adjournment

PLEASE SIGN IN

E-MAIL

LEUNG STARK @ YAHOO. RM

ura_jpavelic@kent.edu

Scott.Branstetter@gmail.com

JHU DAK 4 = roadrunner

Jeremy Fennell @ Howard Young

MTURK1@ROADRUNNER.COM

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	20%
65-74	15%
75-84	10%
85+	5%

City of Twinsburg
COMMUNITY INFORMATION MEETING
US EPA BROWNFIELD CLEANUP GRANT APPLICATION

Tuesday, December 8, 2015

Meeting Summary

The City of Twinsburg conducted a Public Information Meeting on Tuesday, December 8, 2015, in Council Chambers of Twinsburg City Hall. The meeting was announced at a previous Council meeting, advertised in local newspaper, posted in the traditional posting locations, and the agenda was on-line at the City's website. Announcements included instructions to acquire additional information, including the draft Analysis of Brownfield Cleanup Alternatives, the draft application and related information. Contact phone numbers and email addresses were also included. Prior to the meeting the City received requests from two individuals and provided the requested information.

The meeting opened at 6:30pm by the President of Council. Attendees were requested to sign-in, particularly if they wished to receive continuing status reports and further related information should the City be successful in acquiring grant assistance. All attendees were given a copy of the agenda, talking points, a copy of the US EPA Brownfield Cleanup Grant program handout, a copy of the draft "Analysis of Brownfield Alternatives" (ABCA), as well as a question form for noting any questions or concerns and relaying them to the Clerk at or after the meeting.

Mr. Finch, the City's Director of Community Planning and Development, provided a brief overview of the US EPA Brownfield Cleanup Grant program. He also summarized the draft ABCA after which he then described the purpose of the Community Information meeting. Persons wishing to comment were asked to sign a speakers list. Upon speaking they were requested to provide their name and address.

First to speak was Mr. Loren Sengstock. Mr. Sengstock provided and read a written statement (included herein) related to the City's financial condition as it was summarized in the "Annual Information Filing For Fiscal Year 2014." He then provided comments indicating the City was well off financially and that the City is attempting to mislead EPA in that it does not need, nor does it deserve, the financial assistance requested. He also implied that the central area redevelopment and the associated involvement of the Twinsburg Community Improvement Corporation was a conspiracy "to further the profitability of a secretly selected developer".

The next speaker was Mr. Jace Hudak. Mr. Hudak (a resident of Reminderville) commented on the need to avoid development in the City's flood plain area. He provided several pages of written comments and included a copy of sections of a 1970 Corps of Engineers report on the Tinkers Creek Watershed (attached). He implied the City was guilty of "Demolition by Neglect" and provided a written definition of this term. Finally, he noted support for the asbestos mitigation at the Old School, saying it would increase the value of the property.

Ms. Sally Gaydosh was next to speak. Ms. Gaydosh read several sections of the US EPA Guidelines for Brownfield Cleanup Grants. She expressed dissatisfaction in the process of community involvement to date. She provided no comments related to the application itself, nor did she comment on any aspect of the draft "Analysis of Brownfield Cleanup Alternatives".

The final speaker was Mr. Mike Turle, who also provided a written statement (attached). Mr. Turle written statement expressed that he was not opposed to a grant for asbestos mitigation, he was against this grant in that "it will only aid the administration in the demolition of a building that is historically significant to this community and then had over the cleared property to a favored developer who will profit greatly at a monumental financial loss to our City taxpayers." He noted dissatisfaction with the amount of time reserved for the meeting. He also stated that the purpose of the grant all along is to accommodate the demolition of the Old School structure which he has opposed in the past.

There being no other speakers wishing to comment, the information meeting was adjourned at 7:15pm.

This summary provided by Mr. Larry E. Finch, AICP
Director of Community Planning and Development
City of Twinsburg





December 15, 2015

Dear Mr. Sengstock:

The City acknowledges receipt of your written remarks presented at the Community Information meeting of December 8th. This meeting was conducted for the purpose of informing the community of the City's intention to apply for US EPA Brownfield Cleanup Grant assistance for asbestos mitigation at the Old School property, and for obtaining public comment related to the City's proposal as reflected in the Analysis of Brownfield Cleanup Alternatives (ABCA). A copy of your written materials, a summary of comments provided at the hearing, and a copy of this response will be conveyed to the US EPA along with the application materials.

Your comments (and the related handout materials) concerned themselves entirely with the City's financial status. While these comments were not related to the City's proposal as reflected in the Analysis of Brownfield Cleanup Alternatives (ABCA), nor did they reflect any concern related to the process or impacts of the removal of hazardous materials, a response is nevertheless provided herein.

It is unfortunate that your comments reflect such mistrust and contempt for the City and its "political elite." You suggest that the Twinsburg Community Improvement Corporation controls the Old School property and that its purpose is to meet in secret to "negotiate with a developer to ultimately develop and profit from any and all government grants, giveaways, tax abatements" and that "There is no real future for the Old School to benefit the Community of Twinsburg but for a secretly selected developer to financially benefit at the expense of the local and federal governments."

The TCIC does not control the Old School property by reason of ownership, nor does it direct the City in its use or maintenance. The TCIC takes its direction from the City and its Comprehensive Plan. Its primary focus is to assemble property so that a meaningful and coordinated approach to central area development might be accommodated.

It is impossible to satisfy every person with plans that are developed with the overall public interest in mind. The City's Comprehensive Plan was developed with the input of a Comprehensive Plan Committee which included representation from the public, the business community, City commissions and administration. It involved workshops that enabled comment related to the Central Area Plan by more than 30 attendees and experts in the field of land use

**Community Planning & Development
10075 Ravenna Road
Twinsburg, Ohio 44087
330-963-6154**

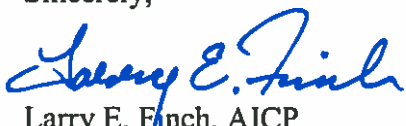
and urban design. The efforts of the City and the Twinsburg Community Improvement Corporation are focused on implementing recommendations developed during this process. That includes utilizing the flood plain for open space and recreational purposes.

The Twinsburg Community Improvement Corporation was formed to assist the City in encouraging investment in pursuit of Comprehensive Plan recommendations. Meetings of the TCIC are public, except for the same executive session permissions afforded a municipality.

With regard to your comments related to City finances, the City is taking a conservative approach to funds management in light of declining income tax revenue receipts and increasing fiscal demands. As a resident of the City, you should be appreciative this approach.

I hope this response provides clarification of the issues you raised. Please be aware that this is only the beginning of the community involvement effort if we are successful in acquiring grant assistance. We encourage comments related to the asbestos mitigation process and any concerns you may have related to the ABCA document. I hope that you will continue to follow and participate in this effort. We will provide regular progress updates at City Council meetings. You can also call my office at any time.

Sincerely,



Larry E. Finch, AICP

Dir. Community Planning & Development

**Community Planning & Development
10075 Ravenna Road
Twinsburg, Ohio 44087
330-963-6154**

CLERK COPY

Loren Sengstock

2704 Arbor Glen, Suite 105

Twinsburg, OH 44087-3084

Cell Phone: Loren - (330) 888-9459

E-Mail Address: lsengstock@yahoo.com

December 8, 2015

Environmental Management Support, Inc.

Attn: Mrs. Edie Findeis Cromwell

8601 Georgia Avenue, Suite 500

Silver Springs, Maryland 20910

Re: City of Twinsburg proposed grant request for asbestos removal at the Old School Site located at 8997 Darrow Road

Dear Mrs. Findeis:

I am a resident of the City of Twinsburg, I do not receive any compensation or stipends from the City of Twinsburg, and as a citizen of Twinsburg want to make known the attempt by the City of Twinsburg, Twinsburg Community Improvement Corporation (TCIC), and other local government officials and government appointees to mislead and misinform the EPA regarding the financial condition and needs of the City of Twinsburg. The following are directly quoted from the City of Twinsburg's audited 2014 annual financial report:

"2014 Economic and Community Development Accomplishments Job Growth

In the last year a number of companies have opened their doors in Twinsburg while several existing companies have expanded facilities and/or added employees. FedEx will occupy a 307,000 square foot new package distribution center at Cornerstone Business Park (former Chrysler Stamping Plant site) and will bring more than 200 full and part-time employees to the site before the end of 2015. Also at Cornerstone Business Park, Scannell Properties is in the process of constructing a multi-tenant industrial building. A tire distribution operation with 15 new employees has already committed to the project and will lease 30,000 square foot of the 203,000 square foot area of the building. Windstream continues to add employees to their 1925 Enterprise Parkway facility. Envision Pharmaceuticals/RxOptions continues to have strong employee growth. With more than 375 employees the company has outgrown its Vantage Office Park space and expanded into the former Windstream building on Canyon Falls Blvd. Giesecke & Devrient America Inc. expanded its parking facilities and made internal modifications to enable it to expand its processes last year. Safran USA also expanded its parking area last year to enable it to add more employees. We are seeing growth in

employment from them this year as a result. As the economy continues to improve we expect to see increased employment and increased income tax revenue.

New Buildings

Building activity includes a mix of new and expanded buildings. New buildings include the 307,000 square foot FedEx building and the 203,000 square foot speculative multi-tenant industrial building at Cornerstone Business Park, the Sussex Memory Care facility off Darrow Road (61,600 square foot), Mirka Abrasives Company on Enterprise Parkway, and the Montessori School on Twin Hills Drive. Building expansions have been completed or are underway at 2377 Enterprise Parkway for Keltec (20,000 square foot), at G.E. Energy's Darrow Road facility (1,200 square foot), and at 2150 Highland Road for General Die Casters (86,700 square foot).

Cornerstone Business Park

The former Chrysler Stamping Plant has been totally removed from the site and all mitigation completed by Scannell Properties, the owner. They are currently in the process of constructing the main business park entry off of E. Aurora Road and are completing remaining infrastructure improvements at the 167-acre site. Even after the construction of FedEx, the speculative multi-tenant building, and Vistar's distribution facility, more than 80-acres of developable land will remain. As infrastructure and buildings are completed there will certainly be increased interest in the site by prospective companies. The City and developer are currently seeking certification of the Cornerstone Business Park as an Ohio "Jobs Ready Site." This certification will place the property as a priority site for evaluation by site selectors through the State of Ohio's Jobs Ohio network.

Comprehensive Plan Update

The update of City's comprehensive plan was completed last year. The comprehensive plan provides an analysis of existing conditions, assessments of problems and opportunities and provides recommendations to address community development goals. This document is important in that it provides a policy and objectives that helps the City focus efforts and expenditures in ways that provide a maximum benefit to the community. This particular update included an emphasis on the City's central area around Twinsburg Square. The City is now in the process of implementing various recommendations. A Community Improvement Corporation has been formed to assist with property assembly and to encourage investment. This area will continue to be the focus of effort for several years in the future.

New and Expanding Businesses in 2014

The following businesses have either established themselves in the community in 2014 or expanded their operation in the City during this year:

• Giesecke & Devriant • Mirka Abrasives • Sanfran USA • G.E. Energy • Keltec, Inc. • General Die Casters • GenoScientific Molecular Diagnostics Laboratory • P3 Infrastructure • Stuff n Puffs • High Tech Battery Solutions • Home Care Diversified Holdings LLC • Joseph, Mann and Creed Debt

Collections • Express Employment • Cross Fit Training • Shasti Pizza Company • Affordable Flowers and Events • Imagine That • Twinsburg Health Mart • Discover Hearing Solutions • Hair Glam Studio • Real Gospel Church • Euphoric Day Spa • Champion Personnel Systems • Parker and Stroom Orthodontics • Tomorrows Home Solutions • Flex-Team Inc. • Mainstream Software, Inc. • Schill Grounds Management • DaVita Dialysis • Salon Ameche, Inc. • Lauden Title, LLC • Havanna's Choice Cigars • G.R.A.S. Sound and Vibration • Scotwire, LLC

Current Related Financial Activities

The City of Twinsburg, in the past, faced some challenging financial years; however with the development of the Cornerstone Project and the addition of several new businesses in the City, we have begun to see growth in employment. As the economy continues to improve we expect to see increased employment and increased income tax revenue. On a cash basis, the municipal income tax revenue represents 87 percent of the City's total general fund revenue. The net income collections (gross collections less refunds) for 2014 were \$22,878,022 compared to 2013 collections of \$25,058,791. This reflects a decrease over last year of 8.70 percent.

As a result of the quarter percent rate decrease to the City's municipal income tax in 2014; the City collected \$2,180,769 less in municipal income tax revenue than in the prior year.

The City continues to operate lean and under budget. With the award of several grants to help support the cost of major capital projects, the City was able to end the year strongly. The general fund 2014 unassigned year balance was \$20,046,754. From 2010 to 2014 the City's general fund beginning balance grew from \$13,943,003 to \$29,975,702. This reflects a 114 percent growth increase.

In an effort to maintain healthy balances, the City created a reserve fund in 2014. This reserve fund is for employee's payouts such as accrued sick time, vacation and compensation time earnings. The City plans to create another reserve fund that will be a stabilization reserve fund for emergency matters in times of revenue fluctuations. Based on the City's strong financial conditions, the City does not anticipate a need to increase the municipal income tax rate in the future.

The City's current credit rating assigned by Moody's is Aa2. The Aa2 rating was reaffirmed in March of 2011 due to the demonstrations of financial stability and the ability to capitalize on development opportunities. The City's system of budgeting and internal controls is well regarded. As a continued effort to stay above the economic challenges, the Administration and City Council meet frequently to discuss current operating conditions, the economy and community development. The City will continue to be proactive by strategizing to maintain solvency not just for today, but for the future."

The City of Twinsburg (City) has received over the last ten audited financial statements (2005 – 2014) an average of \$19,764,993 in income taxes. The City in 2014 audit year has increased total governmental funds revenues by 20.8% more than the 10 year average while increasing governmental funds expenditures by 33.2%. The City has reported as of 12/31/2014 a cash carryover governmental funds balance of \$32,136,783. The City is attempting to mislead the EPA when only discussing the General Fund when they know that total operations of any community are the Governmental Funds.


After reading the grant application and feeling that the City is somehow an impoverished and financially distressed community with major irreparable financial damage due to the closing the Chrysler plant over six (6) years ago is both amusing and downright irresponsible and purposely misleading. The City is attempting to on one hand say how bad off they are and desperately in need of \$200,000 from the EPA to cleanup asbestos at the Old School site while reporting in their 2014 audited financial report how financially secure the City is with a super bond rating and excellent Economic Development going with a bright and fruitful economic future on the horizon.

The application as all the local government elected and appointed officials are saying is a 'community' request, when actually the government(s) is the 'community' requesting this grant. They however have completely and totally left the community who would like to see this property turned into a central park for Twinsburg out of the picture so as to not expose their real reasons for requesting this grant and that is so the property under control of the TCIC can meet in secret and negotiate with a developer to ultimately develop and profit from any and all government grants, giveaways, tax abatements. There is no real future for the Old School to benefit the 'Community' of Twinsburg but for a secretly selected developer to financially benefit at the expense of the local and federal governments.

There have to be better uses for \$200,000 in EPA grant funds from 'Communities' that really need the funding and not a community such as Twinsburg that is blessed to have over \$32 million dollars sitting in the bank waiting to be spent. If the City where to have spent half the time and energy attempting to find out what the real 'Community' wanted like a central park with green space and a sledding hill in use for generations then I could support the efforts to obtain grants so that the whole community could benefit, but sadly must encourage the rejection of this grant because the City is looking once again to promote 'profits' for developers over 'public' purposes that would and could result in less run off into our waterways, less parking lots and commercial buildings, just to satisfy the political agendas of the political elite in Twinsburg.

In summary, since the City has no demonstrated financial need or public purpose for the grant and the intended use is to further the profitability of a secretly selected developer, I must encourage the EPA to not approve this application and instead use the funding for a deserving and financially needy community.

Respectfully submitted,



Loren C. Sengstock

Cc: City of Twinsburg, Mayor Yates [via public meeting]



December 15, 2015

Dear Mr. Hudak:

The City acknowledges receipt of your written remarks presented in response to the Community Information meeting of December 8th. This meeting was conducted for the purpose of informing the community of the City's intention to apply for US EPA Brownfield Cleanup Grant assistance for asbestos mitigation at the Old School property, and for obtaining public comment related to the City's proposal as reflected in the Analysis of Brownfield Cleanup Alternatives (ABCA). A copy of your written materials, a summary of comments provided at the hearing, and a copy of this response will be conveyed to the US EPA along with the application materials.

Your comments (and the related handout materials) concerned themselves with three subjects: flood plain development, Brownfield Guidelines, and "demolition by neglect." I will address each of these subjects. While none of these is directly related to the pursuit of funds to assist with asbestos mitigation, I have provided responses to each.

The City is aware of the relationships between the Tinkers Creek watershed, the regulated flood hazard area, and land development. If you have reviewed the City's Comprehensive Plan document (including the Concept Plan for Central Area Development) you will see that every effort has been made to preserve and protect the flood hazard area of Tinkers Creek and its associated riparian areas. No new development is proposed in any flood hazard area in the City and certainly none is proposed at the property associated with the Old School. Your review of related information will show you that the flood hazard area is anticipated to be preserved as open space. Only that portion of the site which is at above the slope and flood hazard zone would be impacted by any future development; with or without the existing structure. As indicated in the copy of the 1970 Tinkers Creek Flood Plain Information document you provided (see Figure 10 on page 6), the school is at a higher elevation and would not be impacted.

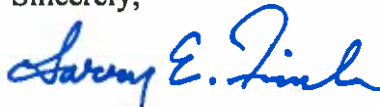
The City is making every effort to comply with guidelines associated with Brownfield Cleanup Grants. Many of the questions you pose in your written comments are addressed in the application materials you have been provided including the history of City's ownership, the nature of contamination, site assessment information, etc.

Community Planning & Development
10075 Ravenna Road
Twinsburg, Ohio 44087
330-963-6154

In your discussion of "Demolition by Neglect" you imply that the City is not maintaining the property for the purposes of circumventing historic preservation regulations. First and foremost, this property is not a nominated or listed historic property subject to historic preservation regulations. Second, the property experienced problems when used by Kent State, including roof leaks, issues with accessibility, inadequate electrical system capacity, lack of air conditioning, plumbing leaks that damaged property, and other issues. The City continues to maintain the property with minimum investment until all options have been explored. City has previously met with the Planning Commission and Architectural Review Board regarding the property and has acquired a "Certificate of Appropriateness" which enables it to file for a demolition permit if a cost-effective use can't be identified.

I hope this response provides clarification of the issues you raised. Please be aware that this is only the beginning of the community involvement effort if the City is successful in acquiring grant assistance. We encourage comments related to the asbestos mitigation process and any concerns you may have related to the ABCA document. I hope that you will continue to follow and participate in this effort. We will provide regular progress updates at City Council meetings. You can also call my office at any time.

Sincerely,



Larry E. Finch, AICP

Dir. Community Planning & Development

Community Planning & Development
10075 Ravenna Road
Twinsburg, Ohio 44087
330-963-6154

EPA Brownfields Grant and EPA Issues

Submitted by:
John K. Hudak
December 8, 2015

Twinsburg is 100% within the Tinkers Creek Watershed

- **Description** Twinsburg is 100% within the Tinker's Creek watershed. This means that rain water and snow melt will eventually drain into Tinker's Creek. Tinker's Creek is the largest tributary to the Cuyahoga River, making protecting water quality extremely important not only for local communities but Lake Erie as well.
- It's the area of land that catches rain and snow and drains or seeps into a marsh, stream, river, lake or groundwater.
- **You're sitting in a watershed now**
Homes, farms, ranches, forests, small towns, big cities and more can make up watersheds. Some cross county, state, and even international borders. Watersheds come in all shapes and sizes. Some are millions of square miles, others are just a few acres. Just as creeks drain into rivers, watersheds are nearly always part of a larger watershed.
- Any New Developments must insure that they DO NOT contribute to **NON-POINT SOURCE POLLUTION**

Tinker's Creek Watershed Partners

Spring Newsletter

- Over the years the City of Twinsburg has been purchasing property along Tinker's Creek in an effort to protect the important resource from development.
- **The City of Twinsburg is completely within the Tinker's Creek watershed** and has over 8 miles of the Creek flowing diagonal through the City. Nearly 82% and 74% of the land on the eastern and western bank respectively is either City owned, Conservancy land or protected by a conservation easement.
- **Developing too close to streams not only negatively affects the health of that stream but can have negative effects on a community due to flooding and erosion issues, costing a community a lot of money to fix. Protecting land along streams from development also provides vital habitat for wildlife and allows the stream to expand during heavy rain events naturally, lessening the impact to the build environment.** These protected lands can also provide an extra amenity to the residents of Twinsburg by allowing them and future generations to enjoy Tinker's Creek.

Brownfields Guidelines

- Meaningful Community Engagement: Involve stakeholders early and use creative outreach methods
- What is the Big Picture: provide details on the reuse and how it will create change
- Who owns it?
- Who Contaminated it? – If applicant, in most cases the site is not eligible
- What happened on the property after acquisition?
- Did owner insure contamination was not exacerbated?
- Applicant must not be responsible for contamination.
- How was it acquired?
- Was due diligence or AAI Phase completed before purchase?
- AAI Environmental Site Assessment, or "environmental due diligence," is utilized by purchasers to evaluate a property for potential environmental contamination and to assess the potential liability for contamination present at the property.
- "Demolition by Neglect" is the term used to describe a situation in which a property owner intentionally allows a historic property to suffer severe deterioration, potentially beyond the point of repair. Property owners may use this kind of long-term neglect to circumvent historic preservation regulations.

Demolition by Neglect

- “Demolition by Neglect” is the term used to describe a situation in which a property owner intentionally allows a historic property to suffer severe deterioration, potentially beyond the point of repair.
- Property owners may use this kind of long-term neglect to circumvent historic preservation regulations.
- Property owners using demolition by neglect as a tactic to work around preservation laws will often argue that the prohibitive cost of repairs and deferred maintenance creates an economic hardship.

1

TINKERS CREEK FLOOD PLAIN INFORMATION TWINSBURG, SUMMIT COUNTY, OHIO

PREPARED FOR
OHIO DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WATER
AND
TRI-COUNTY REGIONAL PLANNING COMMISSION
BY
CORPS OF ENGINEERS, U.S. ARMY
BUFFALO DISTRICT
APRIL 1970

2

**FLOOD PLAIN INFORMATION
TINKERS CREEK
TWINSBURG, SUMMIT COUNTY
OHIO**



PREPARED FOR
OHIO DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WATER
AND
TRI-COUNTY REGIONAL PLANNING COMMISSION
BY
CORPS OF ENGINEERS, U. S. ARMY
BUFFALO DISTRICT
APRIL 1970

Note: The Following Information was reported in 1970

- This study covers approximately 11.6 miles of Tinkers Creek, all within Summit County.
- Within this reach the creek flows through the city of Twinsburg.
- It is intended that this report be used by planners and local officials as a guide toward developing effective legislation for the control of land use in the flood plain.
- Whenever reference is made to the flood plain in this report it refers to the area which would be inundated by the Standard Project Flood.
- The city of Twinsburg has in recent years restricted to a minimum the amount of new construction in the flood plain area.
- Therefore, the recurrence of recent floods such as the January 1959 and the 20 July 1969 floods would not result in substantially increased damages.
- Although the flood damages to residences has not been appreciable in recent years, there would be considerable damages resulting from a flood of Intermediate Regional or Standard Project magnitude.
- *Since this 1970 report, a tremendous amount of development has occurred both in the Flood Plain and more significantly the areas that are more than 100 feet higher in elevation including: The Twinsburg Industrial Park, Canyon Falls Park, North of the City on Darrow Road.

Note: The Following Information was reported in 1970

- This flood plain district has been established to regulate development in these flood danger areas to minimize loss of human life and costly property damage.
- The regulations do not permit indiscriminate development, thus reducing the threat and severity of floods as well as the danger of widespread pollution.
- ~~There has not been any new construction in the flood plain in recent years.~~
- This accounts for the small amount of damage to the Twinsburg area from recent floods.
- It is of the greatest Importance that respect for the Tinkers Creek flood plain be continued by extending and rigidly enforcing the zoning code to prevent any future construction that would contribute to greater runoff or be substantially damaged by flood waters.

Possible future flood heights. Photos taken September 1969

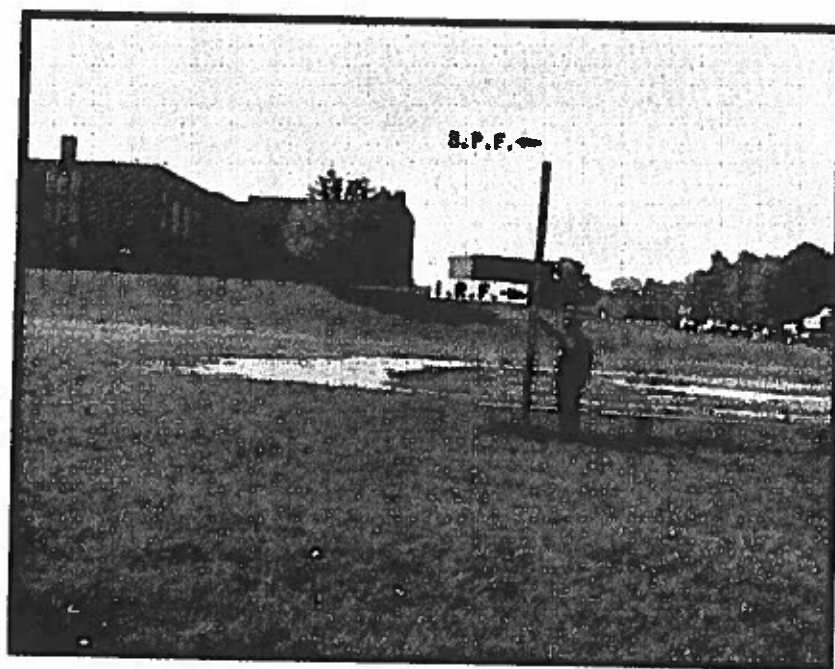


Figure 40 - Arrows indicate the heights of the Standard Project and Intermediate Regional Floods at Twinsburg Elementary School, stream mile 18.32.

The Old School Ballfield

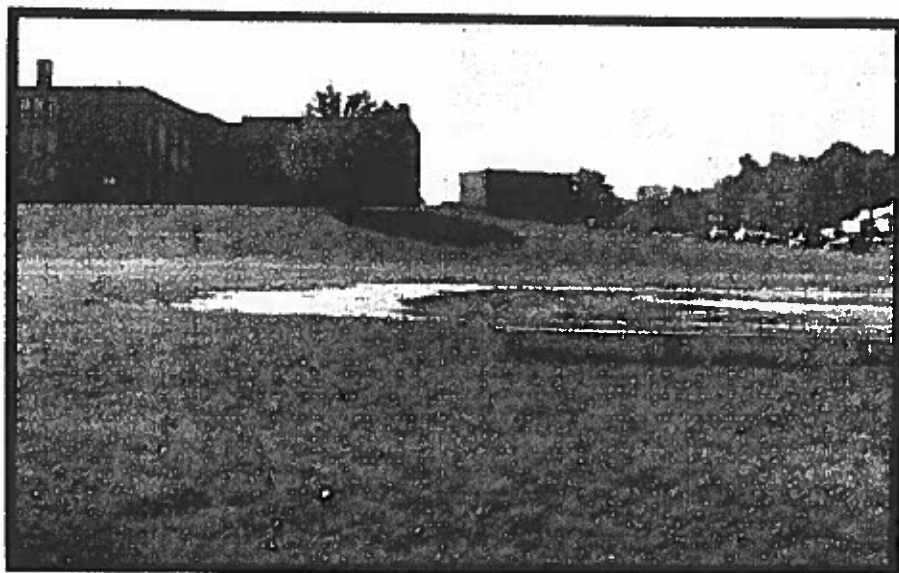


Figure 10 - Twinsburg Elementary School, stream mile 18.5 The athletic facilities would be inundated by both the Intermediate Regional and Standard Project Floods while the school, being at a higher elevation, would not be affected.

Ravenna Road southeast of Cannon Road does become covered at high stages and in the event of the Standard Project Flood, Ravenna Road would be Inundated between Cannon and Aurora Roads.



Figure 41 - Arrows indicate the heights of the Standard Project and Intermediate Regional Floods on Ravenna Road, stream mile 19.1.

1959 Flooding of East Idlewood



Figure 26 - Mrs. John Demyan of East Idlewood being assisted to higher ground during January 1959 flood.

1969 Flooding of Glenwood Drive

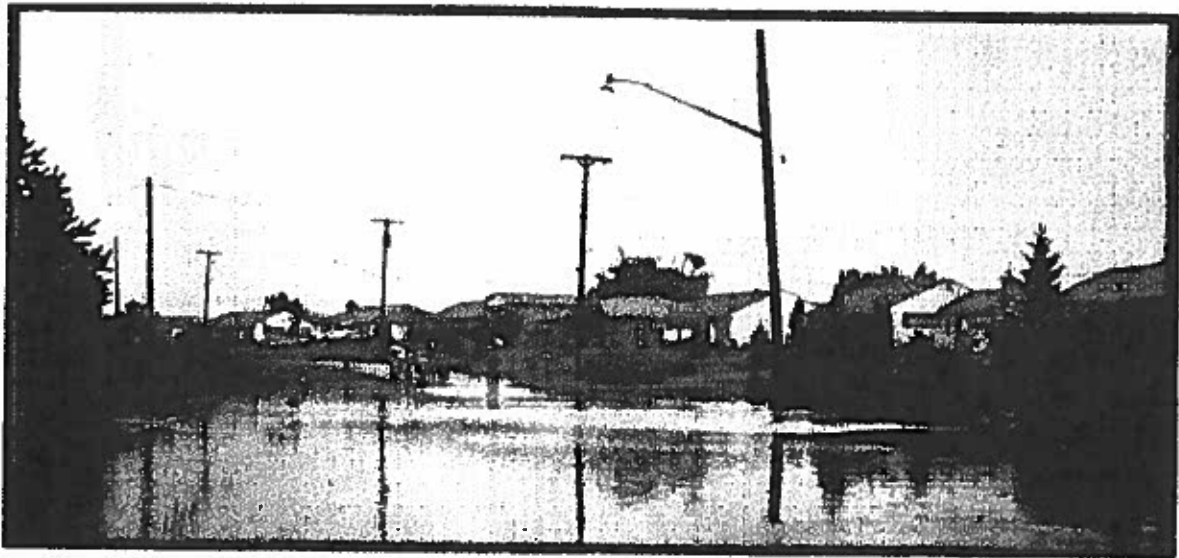


Figure 31 - 20 July 1969 high water as viewed from intersection of Sunview Drive and Glenwood Drive, stream mile 13.8.



December 15, 2015

Dear Ms. Gaydosh:

The City acknowledges and appreciates your remarks presented in response to the Community Information meeting of December 8th. This meeting was conducted for the purpose of informing the community of the City's intention to apply for US EPA Brownfield Cleanup Grant assistance for asbestos mitigation at the Old School property, and for obtaining public comment related to the City's proposal as reflected in the Analysis of Brownfield Cleanup Alternatives (ABCA). A summary of comments provided at the hearing, and a copy of this response will be conveyed to the US EPA along with the application materials.

Your comments concerned themselves primarily with the US EPA Guidelines for Brownfield Cleanup Grants and procedures related to the Community Engagement element. As you noted, EPA wishes to assure that adequate opportunities have been provided for the community to express their concerns related to funded cleanup activities. The Community Information meeting was the first meeting conducted to announce the City's intent to make application to the program for financial assistance related to the elimination of hazardous substances from the "Old School" property. The purpose of this meeting was to both inform the community of the City's intent to make application, and to accept comments and concerns related to health, safety, and community disruption potentially posed by cleanup activities. Drafts of both the application and the Analysis of Brownfield Cleanup Alternatives (ABCA) documents were made available prior to the meeting. This meeting was advertised in compliance with program guidance and it was previously announced at a prior City Council meeting. Advertisements related to the meeting included information on how to obtain a copy of the application and ABCA documents. This meeting is only the first step in community engagement related to any potential grant funded activities.

Twinsburg intends to make every effort to comply with and exceed the requirements of community engagement related to funded activities. We encourage comments related to the asbestos mitigation process and any concerns you may have related to the ABCA document.

**Community Planning & Development
10075 Ravenna Road
Twinsburg, Ohio 44087
330-963-6154**

I hope this response provides clarification of the issues you raised. I hope that you will continue to follow and participate in this effort. We will provide regular progress updates at City Council meetings. You can also call my office at any time.

Sincerely,



Larry E. Finch, AICP

Dir. Community Planning & Development

**Community Planning & Development
10075 Ravenna Road
Twinsburg, Ohio 44087
330-963-6154**



December 15, 2015

Dear Mr. Turle:

The City acknowledges receipt of your written remarks presented at the Community Information meeting of December 8th. This meeting was conducted for the purpose of informing the community of the City's intention to apply for US EPA Brownfield Cleanup Grant assistance for asbestos mitigation at the Old School property, and for obtaining public comment related to the City's proposal as reflected in the Analysis of Brownfield Cleanup Alternatives (ABCA). A copy of your written materials, a summary of comments provided at the hearing, and a copy of this response will be conveyed to the US EPA along with the application materials.

Your qualified support for the removal of asbestos from the subject property is appreciated. While removal of all ACM's (the recommended plan) would support demolition of the structure, it also represents the most flexible alternative. It will remove all ACM's so that no future effort, on behalf of renovation or demolition, will be required. Therefore no remaining financial, regulatory burden, or special material handling procedures, would be imposed on future users of the building for the purposes of eliminating hazardous materials to deal with remaining asbestos disturbance.

You suggest that the Twinsburg Community Improvement Corporation (TCIC) controls the Old School property and that its purpose is to benefit developers of their choosing. This is not purpose of the TCIC. The Twinsburg Community Improvement Corporation was formed to assist the City in encouraging investment in pursuit of Comprehensive Plan recommendations. Meetings of the TCIC are open to the public, except for the same executive session permissions afforded a municipality. The goals and objectives of the TCIC, its By-laws, and its Conflict of Interest Policy are available at its website. See www.twinsburgcic.com.

The TCIC does not control the Old School property by reason of ownership, nor does it direct the City in its use or maintenance. The TCIC takes its direction from the City and its Comprehensive Plan. Its primary focus is to assemble property so that a meaningful and coordinated approach to central area development might be accommodated.

**Community Planning & Development
10075 Ravenna Road
Twinsburg, Ohio 44087
330-963-6154**

Your concern related to preserving elements of the City's past is acknowledged. In pursuing this effort the City must consider all facets and issues from a variety of perspectives, including those related to housing opportunity, community development, economic development fiscal prosperity, as well as, community goals and objectives as reflected in the Comprehensive Plan. As this effort proceeds the administration will consider all these perspectives as well as the input provided by the community.

I hope this response addresses the issues you raised. Please be aware that this is only the beginning of the community involvement effort if the City is successful in acquiring grant assistance. We encourage comments related to the asbestos mitigation process and any concerns you may have related to the ABCA document. I hope that you will continue to follow and participate in this effort. We will provide regular progress updates at City Council meetings. You can also call my office at any time.

Sincerely,



Larry E. Finch, AICP

Dir. Community Planning & Development

**Community Planning & Development
10075 Ravenna Road
Twinsburg, Ohio 44087
330-963-6154**

I am not against a grant for assistance in asbestos removal, I am, however, against this grant as it is only aid this administration in the demolition of a building that is historically significant to this community and then hand over the cleared property to a favored developer who will profit greatly, at a monumental financial loss to our city taxpayers.

On February 12th, I spoke at a city council meeting to express my concerns and offer reasons to save Twinsburg Old School. Rumors had been circulating for some time about demolition and I wanted to provide options. The mayor told us she would. (REPORTED IN TWINSBURGH PATCH)

Several people joined my effort and we formed the Twinsburg Old School Committee. We sought to present options for use, finance and contractors. Again, we were dismissed. We were told about concerns over asbestos. My reply was there was never a concern while Kent State rented the building and, if demolished, it would definitely have to be removed. If the building stayed, it could be encapsulated behind drywall.

The reason for demolition was concerns about ADA requirements. Again, there were no problems with Kent State with the ramp and chairlift, therefore the ADA concerns do not exist and are not a reason for demolition. In fact, our current city hall did not meet ADA requirements until last year after our committee brought it to the Council's attention.

On September 6th, 2013, I had to call the city Building Department about the uncut grass and weeds, dilapidated awning and overall poor condition and appearance of the building. These concerns were addressed in time. On June 27th, 2014, I had to call again about the city's continued neglect of the location.

Our grass-roots community support grew in excess of 500 members on our Facebook page.

The city then went on a media campaign. "Fiscal responsibility" became their new mantra. A letter to the local newspaper threatened a reduction in city services if the building were to be sued. At the same time, our city coffers were showing a \$30 million case reserve. In the meantime, I asked the mayor and council at a council meeting for a place on the agenda at the next meeting to present my plan for use. I was never given that opportunity. It was never city hall's intent to do anything but demolish this piece of history.

I was never given any answers. Roughly \$700,000 in missing utility receipts while Kent State was a tenant. This administration has not worked within the community and has only sought to use this beloved building as a financial windfall for friendly developer.

The Twinsburg Community Improvement Corporation, hereafter referred to as the CIC, is a private entity made of elected government officials that is allowed use of public funds and lands to "benefit developers of their choosing", and Twinsburg Old School is the next target in their crosshairs.

The plan presented by our city planner is to demolish the building for \$500,000 and sell to developers for \$1,000,000 for a net gain of \$500,000. The property, for tax purposes, lists at \$2,700,000 and could likely sell on the open market for much more. This results in a loss of \$2.2 million to taxpayers, if not more.

My desire is to reuse the building for the people, the community stakeholders. This building has lasted 10 presidents, a Great Depression, 2 World Wars and many more trying

tribulations of the ages. It should be able to last a few years in the limbo the city has created for it. Simply because they have "no plan", the city would destroy this piece of history and sell out its historic foundation. [REDACTED] They are guilty of "Demolition by Neglect" and do not deserve this grant. I now will present my plan, as to which would be supportive of the Financial Assistance for Asbestos Abatement.

Michael A. Turtle

MICHAEL A TURTLE
9930 FOREST LAKE DR
TWINSBURG OH 44087
216.410.3561

MTURLE1@ROADRUNNER.COM

ATTACHMENTS

Attachment 3f – Draft Analysis of Brownfield Cleanup Alternatives

**US EPA BROWNFIELD CLEANUP APPLICATION
CITY OF TWINSBURG, OHIO**

**ANALYSIS OF BROWNFIELD CLEANUP
ALTERNATIVES (ABCA)**

**An evaluation of alternative approaches to
asbestos mitigation at the “Old School” property
at 8997 Darrow Road**

**Prepared by
The Department of Community Planning & Development
10075 Ravenna Road
Twinsburg, Ohio 44087**

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA)

TABLE OF CONTENTS

i.	Site and Contamination Issues	1
ii.	Evaluation of Cleanup Alternatives	2
iii.	Resilience in Light of Changing Climate Conditions	5
iv.	Recommendation	6

Analysis of Brownfield Cleanup Alternatives

i. Site and Contamination Issues

Phase 1 and Phase 2 Environmental Assessments and an Asbestos Survey have been conducted for the subject site and structure located at 8997 Darrow Road. The property consists of 5.5 acres of land in two parcels, upon which has been constructed a school building of approximately 54,000 s.f. of area. The building was constructed in the center of the site in two phases. The first building was constructed in 1921. An addition of nearly equal size was added in 1952.

In an effort to gain a better understanding of the building's potential for adaptive re-use, the City commissioned a code compliance survey, an Americans with Disabilities Act Accessibility Survey, a Phase 1 and Phase 2 Environmental Assessment and Asbestos Survey. The Phase 1 Environmental Assessment occurred in June, 2012. It was performed by Turn Key Environmental Services. Findings of the study were as follows (see also Attachment #):

- A fuel oil UST, that formerly supplied oil for the furnace was identified on the east side of the building (this UST has been removed with the assistance of a NEFCO Phase 2 assessment grant).
- Transformers of unknown content were identified in a room at the north end of the building.
- Asbestos containing materials (ACM's) were noted in the building, including pipe insulation, tiles and other materials. A comprehensive asbestos survey was performed separate from this Phase I to clarify.
- Further soils investigation was recommended because of the sites upgrade gradient location from a former gas station on adjacent property.
- Further soils investigation was recommended in the area of the former bus garage where a UST was removed with only limited sampling.

In response to the Phase 1 findings, a fuel oil tank was removed and additional testing performed in the areas of interest. An asbestos survey was conducted also. The Asbestos Inspection Report, was performed by TesTech, for Turn Key Environmental Services in November of 2012. Samples were collected using protocols described in Section 763.86 of the Asbestos Hazard Emergency Response Act (AHERA). Samples were transported using a chain of custody, to Schneider laboratories Global, Inc. in Richmond, Virginia where they were analyzed using polarized light microscopy (PLM) and EPA Method 600/R-93/116. The following are confirmed asbestos containing materials (see also Attachment #):

- Window glazing compound
- Bulletin board mastic
- Floor tile and mastic (appeared very thick and may be friable during demolition)

Analysis of Brownfield Cleanup Alternatives

- Built up roofing
- Parapet wall cap joint sealer
- Caulking
- HVAC duct insulation
- Cement board
- Pipe insulation (runs and fittings in the crawl space were in poor condition)
- Caulking
- Acoustical ceiling tile mastic

According to Ohio EPA regulations, an ACM containing no more than 1 percent asbestos may not be considered for abatement purposes, but instead requires notification to workers exposed to these materials to enable property management of materials containing trace amounts of asbestos. ACMs which contained trace amounts of asbestos (less than 1%) were subjected to a more definitive "Point Count" analysis.

Fifty-eight of the two hundred eighty five samples analyzed contained greater than one percent asbestos, resulting in their classification as ACM. Regulated Asbestos Containing Material (RACM) and NESHAP Category I and II materials may become friable during renovation or demolition and therefore must be removed by an Ohio Department of Health (ODH) Asbestos Hazard Abatement Contractor using appropriate protocols as specified in applicable regulations.

Non-friable ACM which are not likely to become friable during demolition may be permitted to remain in place during demolition or renovation but must be handled and disposed of in accordance with ODH and other applicable federal and state regulations.

ii Evaluation of Cleanup Alternatives

Alternatives

Three alternative approaches to asbestos concerns at the Property have been considered as have the repercussions of these approaches on the City's Comprehensive Plan objectives. Alternative Brownfield Cleanup approaches evaluated include the following:

1. No Action – In this approach the City would take no action related to remediation of asbestos at the property.
2. ACM Removal – This approach would include the removal of ACM's (more than 1% asbestos containing materials) from the structure. This approach would enable renovation of the structure, but would still require notification to workers and the need for appropriate OSHA asbestos regulations to be imposed as during renovation activities.
3. Complete ACM Removal – This approach would involve the removal of all ACM, including those materials containing less than 1% asbestos. This would enable

Analysis of Brownfield Cleanup Alternatives

renovation without the need to adhere to ACM regulations where future renovation occurs and would enable demolition of the remaining structure in the event renovation was not practical.

ii. Evaluation of Cleanup Alternatives

Alternative 1 – This is the “no action” alternative and as such, it will have no material effect on the elimination of environmental hazards associated with ACM’s inherent in the Old School structure. As the structure ages, a no action alternative will become less and less acceptable as building condition continues to decline and as more asbestos containing material becomes exposed or friable. Occupancy of the building is no longer possible without renovations that would require mitigation of ACM’s. Therefore, the no action alternative would condemn the building to perpetual vacant status.

This no action alternative would contribute nothing to the potential to use, or to adapt, the Old School structure for productive purposes. Further, it would burden a key central Twinsburg property with an un-usable vacant property which would discourage investment in the balance of the property and would discourage property investments by adjacent property owners whose properties would be adversely impacted by the image and potential hazards associated with a declining structure containing hazardous substances.

While this may represent the easiest Alternative to pursue, it represents a completely unacceptable alternative for a municipal owner who is burdened with the responsibility to protect the public health and safety and to advance the welfare of the community.

Alternative 2 – this alternative will result in the removal of all asbestos containing material and friable NESHAP category I and II material. Removal of these materials may not be necessary if they can be isolated and encapsulated.

Based on the Asbestos Inspection Report completed by Tes Tech Inc. for Turn-Key Environmental Services, fifty-eight samples contained more than one percent asbestos and were therefore classified as ACM’s. No materials were found to contain one percent or less asbestos (trace materials).

Materials and quantities are summarized in the following:

Analysis of Brownfield Cleanup Alternatives

Asbestos Inspection Summary

Material	Location	Amount	Analytical Result
Glazing compound	windows	905 s.f.	Chrysotile
Bulletin board mastic	bulletin boards	150 s.f.	"
Floor tile	throughout	26,200 s.f.	"
Floor tile mastic	throughout	26,200 s.f.	"
Built-up roofing	old building	12,000 s.f.	"
Sealer	parapet walls	450 s.f.	"
Caulking	parapet walls	60 s.f.	"
Chalk board mastic	room 107	125 s.f.	"
Duct insulation	HVAC	1 s.f.	"
Cement board	Room 1 & 2	125 s.f.	"
Pipe insulation	throughout	1,100 s.f.	"
Duct insulation	crawlspace	100 s.f.	"
Window/door caulk	throughout	1,083 s.f.	"
Mastic	throughout	3,200 s.f.	"

As you might anticipate based on the above list of ACM's, only limited opportunities will exist to isolate and encapsulate ACM's during a building renovation. It may not be possible to avoid disturbance of ACM's in duct insulation, pipe insulation, caulking applications, and other locations because the structure will require substantial infrastructure upgrades to accommodate new and more efficient heating, ventilation and plumbing systems. Further, more time and effort will be expended in the preparation of ACM specifications to accommodate instructions related to what will be removed or not removed, and to document the necessary standards to be applied to isolation and encapsulation for each ACM. For these reasons, it is not likely that a significant cost difference will occur between this alternative and Alternative 3.

In addition to the costs of ACM removal, future renovation may require appropriate handling of any remaining materials containing asbestos and would impose the need for OSHA asbestos regulations and practices to be employed by those performing future renovation activities. These practices will add costs to the process of any further renovation, particularly where those costs might involve utilities and other building elements which may have been encapsulated for the present time.

This alternative would be implementable and would enable adaptive re-use of the structure provided the combined costs of asbestos mitigation and building renovation does not exceed the ability to finance or amortize total costs without substantial public subsidy.

Alternative 3 – This alternative would result in the removal of all ACM's and Trace Materials. In that no Trace Materials have been identified in the Asbestos

Analysis of Brownfield Cleanup Alternatives

Inspection report, the ACM's identified in the list of ACM material appearing in Alternative 2 would be removed in this Alternative. No ACM's would be isolated or encapsulated and therefore no future regulatory burden associated with ACM's would apply to the property.

This alternative would be implementable and would enable adaptive re-use of the structure provided the combined costs of asbestos mitigation and building renovation does not exceed the ability to finance or amortize total costs without substantial public subsidy. Complete removal of ACM's would also enable the current structure to be demolished. This would enable more intense development to occur on the site than what is there currently and could provide greater economic activity. If demolition is pursued, costs associated with this alternative could be similar to Alternative 2. This is possible as even though more ACM material is being removed, none will be isolated and encapsulated in a remaining building. Some costs savings would occur due to material handling requirement differences which would enable demolition of cohesive sections of ACM's in a more efficient manner. In addition, more simplified specifications and oversight is possible with demolition than with the isolation and encapsulation of multiple ACM types and locations.

Estimated costs for each alternative is summarized in the following table:

Alternative	Preparation of Specifications	Contractor's Costs	Oversight/ Clearance	Max. Total Cost
Alternative 1	0	0	0	0
Alternative 2	\$ 18,000	\$ 150,00-\$200,000	\$ 18,000	\$ 236,000
Alternative 3	\$ 15,000	\$ 150,00-\$220,000*	\$ 15,000	\$ 250,000

iii Resilience in Light of Changing Climate Conditions

Alternatives that result in the renovation of the existing structure will have little relative difference when considering potential climate change. The useful life of the existing structure would be extended, perhaps for decades. Benefits associated with utilizing the existing structure include the preservation of energy and materials already incorporated into the structure.

In considering potentially changing climate conditions there is little difference between mitigation with complex renovation, and mitigation with site clearance and new, more energy efficient construction. This is because the energy and resources consumed to mitigate asbestos, repair the resultant damage, and renovate the structure for contemporary uses will be similar or greater than the energy and resources consumed in the mitigation for demolition, site clearance and reconstruction. Further, demolition and

Analysis of Brownfield Cleanup Alternatives

reconstruction will enable more intense contemporary mixed use development to occur on this larger site where more efficient live/work relationships might be provided. These uses and relationships will have collateral impacts including reduced vehicle trips, more efficient energy use, less land consumption, etc., all of which have a more efficient and sustainable relationship with potential climate change.

iv Recommendation

Alternatives were ranked on their ability to achieve the removal of hazardous substances while at the same time contributing to community objectives. Each was ranked from 1 to 5, with 5 being the most favorable value.

Based on this preliminary ranking Alternative 3 – Complete ACM Removal is the recommended alternative. This Alternative provides the most effective hazard abatement with the most certain relief from future regulatory burdens associated with renovations or other construction or destruction activities. It also has the greatest future use potential in that it would enable all land use opportunities ranging from adaptive reuse of the building through total site redevelopment.

Alternative Ranking

Characteristic	Alternate 1	Alternate 2	Alternate 3
Implementability	0	4	5
Effective mitigation of hazard	0	4	5
Future regulatory burden	0	4	5
Adaptive reuse potential	1	3	3
Community image	0	3	3
Cost	5	5	4
Future use potential	1	3	5
Total	7	26	30

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

12/17/2015

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Twinsburg

* b. Employer/Taxpayer Identification Number (EIN/TIN):

34-0064070

* c. Organizational DUNS:

0238160310000

d. Address:

* Street1:

10075 Ravenna Road

Street2:

* City:

Twinsburg

County/Parish:

* State:

OH: Ohio

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

44087-1718

e. Organizational Unit:

Department Name:

Planning & Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Larry

Middle Name:

* Last Name:

Finch

Suffix:

Title:

Dir. Community Planning & Development

Organizational Affiliation:

* Telephone Number:

330-963-6154

Fax Number:

330-963-6285

* Email:

lfinch@twinsburg.oh.us

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OSWER-OBLR-15-06

* Title:

FY16 Guidelines for Brownfields Cleanup Grants

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Twinsburg Old School Asbestos Mitigation

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

14

* b. Program/Project

14

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

06/01/2016

* b. End Date:

12/31/2018

18. Estimated Funding (\$):

* a. Federal	200,000.00
* b. Applicant	50,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	250,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on 12/16/2015 .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Larry

Middle Name:

* Last Name:

Finch

Suffix:

* Title:

Dir. Community Planning & Development

* Telephone Number:

330-963-6154

Fax Number:

330-963-6285

* Email:

lfinch@twinsburg.oh.us

* Signature of Authorized Representative:

Larry Finch

* Date Signed:

12/17/2015